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**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES**

ADRIAN RISKIN,
Petitioner,
vs.
THE ACCELERATED SCHOOLS,
Respondent.

Case No. 19STCP05135

**NOTICE OF HEARING ON MOTION
FOR PETITION FOR WRIT OF
MANDAMUS DIRECTED AT THE
ACCELERATED SCHOOLS**

[Gov't Code § 6250, *et seq.*; Civ. Proc. Code §§ 1060, 1085; Civ. Code § 3422]

Judge: Honorable Mary H. Strobel
Date: March 23, 2021
Time: 09:30 A.M.
Dept: 82

NOTICE OF HEARING ON MOTION

TO RESPONDENT THE ACCELERATED SCHOOLS ("TAS" or "Respondent") and to its attorney of record, Mr. Jeffrey L. Anderson, Esq.:

PLEASE TAKE NOTICE that on March 23, 2021, at 09:30 a.m. in Department 82 of the Los Angeles Superior Court, located at 111 North Hill Street, Los Angeles, California 90012, the Court will hold a hearing on the Verified Petition of Adrian Riskin ("Petitioner") for a writ of mandate directed to the respondent TAS, pursuant to the

1 California Public Records Act (Govt. Code § 6250 *et seq.*) ("CPRA"), and Article I, Section
2 of the California Constitution. The Petition asks the Court for relief on the grounds that
3 TAS has violated the CPRA by unlawful delays and improperly refusing to produce all
4 responsive public records.

5 Petitioner respectfully requests that the Court grant him the following relief:
6 issuance a writ of mandate directing Respondent to provide Petitioner with all requested
7 non-exempt records; a declaration that Respondent's conduct, policies, and pattern and
8 practice of denying access to public records violates the CPRA; a permanent injunction
9 enjoining Respondent, its agents, employees, officers, and representatives from
10 continuing its existing pattern and practice of violating the statutory requirements of the
11 CPRA; and for Petitioner to be awarded reasonable attorney's fees and costs incurred in
12 bringing this action, as provided in Government Code Section 6259.

13 Petitioner's request is based on this Notice; on the attached Memorandum of
14 Points and Authorities, as well as on the exhibits attached to that Memorandum of Points
15 and Authorities; the Declaration of Adrian Riskin, as well as on the exhibits attached to
16 that declaration; the Declaration of Robert D. Skeels, as well as on the exhibits attached to
17 that declaration; on Petitioner's Verified Petition for Writ of Mandamus, as well as on the
18 exhibits attached to the Verified Petition; on all pleadings, files, and records in this action;
19 and on such other argument as this Court may receive at the hearing on the petition.

20
21 DATED: January 21, 2021

22 Respectfully Submitted,
23
24

A handwritten signature in black ink, appearing to read "Robert D. Skeels", is written over a horizontal line.

25
26 Robert D. Skeels
27 Attorney for Petitioner and Plaintiff
28

1 ROBERT D. SKEELS, SBN 325896
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6

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8 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**

9 **FOR THE COUNTY OF LOS ANGELES**

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11 ADRIAN RISKIN,
12 Petitioner,
13 vs.
14 THE ACCELERATED SCHOOLS,
15 Respondent.

Case No. 19STCP05135

**MEMORANDUM OF POINTS AND
AUTHORITIES IN SUPPORT OF
PETITION FOR WRIT OF MANDAMUS;
DECLARATIONS OF ROBERT D.
SKEELS & ADRIAN RISKIN.**

16
17 [Gov't Code § 6250, *et seq.*; Civ. Proc.
18 Code §§ 1060, 1085; Civ. Code § 3422]
19
20

21
22 Judge: Honorable Mary H. Strobel
23 Date: March 23, 2021
24 Time: 09:30 A.M.
25 Dept: 82

26 TO THE HON. MARY H. STROBEL, JUDGE OF THE SUPERIOR COURT:

27 Petitioner Adrian Riskin hereby submits his Memorandum of Points and
28 Authorities in support of an order compelling Respondent The Accelerated Schools to
disclose public records sought in the Petition filed December 3, 2019.

Dated: January 21, 2021



29 Robert D. Skeels, Attorney for Petitioner

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MEMORANDUM OF POINTS AND AUTHORITIES

I. INTRODUCTION

A. Factual Background of Case

This California Public Records Act (“CPRA”) lawsuit arises from records requests by Adrian Riskin (“Petitioner”) to The Accelerated Schools (“TAS” or “Respondent”). Riskin submitted six separate requests for public records to TAS asking for access to clearly-identifiable public records fundamental to the TAS’ operation. The requests, summarized individually below, ranged in dates from from January 19, 2019 to April 6, 2019. Riskin’s requests came on the heels of a contentious and high-profile strike by TAS teachers.¹ Four of Riskin’s six public records requests were exclusively in regards to correspondence between TAS and outside agencies, entities, and individuals, while one of the remaining two requests reasonably would have included outside agencies, entities, and individuals as well.

Riskin made repeated attempts to encourage Respondent to comply with the CPRA. Riskin provided Respondent with passages from the CPRA to assist them in compliance. Riskin continually reminded Respondent of the statutory deadlines. Riskin extended his own deadlines to proceed with litigation when he learned that TAS had changed leadership, and he then encouraged the new leaders to comply with the CPRA where their predecessors had not. See Declaration of Adrian Riskin to Petitioner's Memorandum of Points and Authorities in Support of Petition for Writ of Mandamus at ¶16 ("Riskin Dec."); see also Verified Petition for Writ of Mandate and Complaint for Declaratory and Injunctive Relief ¶¶8–68. TAS did not comply with the CPRA. TAS neither supplied responsive records, nor provided Riskin with a determination as to the records' disclosability or an estimated date by which these requested documents will be

¹ See e.g. "Charter School Teachers Return To Classroom After 8-Day Strike" <https://lasvegas.cbslocal.com/video/4017750-charter-school-teachers-return-to-classroom-after-8-day-strike/> [as of January 18, 2021]; "LA Teachers Union Signals Contract Talks Resuming On 3rd Day Of Strike" <https://talkingpointsmemo.com/news/la-teachers-union-contract-talks-resume-hints> [as of January 18, 2021].

1 produced. Ultimately, with public records requests outstanding as much as eleven
2 months, Riskin filed and served a Petition and Complaint under Government Code
3 § 6259(a)² for the instant case on December 3, 2019 (“12/3/19 Petition”).

4 **B. Timeline Common to All Requests After Filing of Petition**

5 Respondent’s counsel requested an extension on December 30, 2019 by telephone,
6 which was subsequently agreed upon by Riskin after being informed by his attorney. See
7 Declaration of Robert D. Skeels to Petitioner’s Memorandum of Points and Authorities in
8 Support of Petition for Writ of Mandamus at ¶2 (“Skeels Dec.”). TAS’s counsel emailed a
9 written confirmation of the extension granted on December 30, 2019, attached as *Exhibit*
10 *A* to Skeels Dec. On January 28, 2019 TAS’ counsel requested another extension “from
11 January 31, 2020 up to and including Friday, February 14, 2020, for TAS to respond to your
12 client’s writ petition?” *Exhibit B* Skeels Dec. Riskin’s response on January 29, 2020 was
13 that he was willing to grant the second extension, but on the condition that TAS commit
14 to providing an agreed upon amount of responsive records monthly until all the
15 responsive records were disclosed. *Exhibit C* Skeels Dec.

16 TAS sent an email on January 31, 2020 stating that they decided to file an Answer
17 to the 12/3/19 Petition, declining Riskin’s offer to receive responsive records in monthly
18 batches, saying that “TAS does not anticipate such an elongated process”. *Exhibit D*
19 Skeels Dec. On February 13, 2020, TAS sent a status update email speculating production
20 of responsive records by the end of February 2020, and asking for “an initial demand for
21 fees”. *Exhibit E* Skeels Dec. TAS sent another email on March 18, 2020 explaining,
22 understandably, delays caused by an “expanding Coronavirus crisis”, but no estimated
23 date was provided for production. *Exhibit F* Skeels Dec. On June 16, 2020 TAS sent an
24 email requesting an accounting of Riskin’s reasonable attorney’s in advance of the July 7,
25 2020 Trial Setting Conference (“TSC”), and hinted at the possibility of production of
26 responsive records. *Exhibit G* Skeels Dec. Riskin’s attorney called TAS’ attorney on June

28 ² All subsequent statutory references in this memorandum are to the California Government
Code, unless otherwise noted.

1 18, 2020 and they conferred on a number of issues, including a fees statement, potential
2 settlement agreement clauses, mutually requesting a distant hearing to provide TAS time
3 to comply, and, most importantly, the production of responsive records. See Skeels Dec.
4 at ¶10. On June 22, 2020, prior to the TSC, Riskin’s attorney emailed TAS with invoices
5 for ordinary costs of litigation and reasonable attorney’s fees in anticipation of responsive
6 records production and settlement. *Exhibit H* Skeels Dec.

7 After the July 7, 2020 TSC there was seemingly no more communication from TAS.
8 On September 19, 2020, Riskin’s attorney sent an email asking for status. *Exhibit I* Skeels
9 Dec. Receiving no timely response, Riskin’s attorney sent a follow-up email on October
10 29, 2020. *Exhibit J* Skeels Dec.

11 **C. Initial Production of Purportedly Responsive Records**

12 On October 30, 2020, nearly eleven months after Riskin’s filing of his 12/3/19
13 Petition, TAS sent an email containing, *inter alia*, a link to a document sharing site with
14 seemingly responsive records — more specifically “(1) Correspondence of today’s date in
15 response to the Public Records Act Request received in the referenced matter; [¶] (2) Zip
16 File containing Responsive Documents referenced (Bates Nos. TAS000001 through
17 TAS55675; [¶] (3) [¶] Zip File containing Documents produced as TAS000001 through
18 TAS55675 in its native form; [¶] (4) [Proposed] Settlement Agreement and Release of All
19 Claims; and, [¶] (5) Proof of Service by Electronic Mail.” The email and its attendant
20 attachment items (1), (4), and (5)³ are attached as *Exhibit K* to Skeels Dec.

21 While the records were included in both native formats and converted pdf files
22 with Bates stamps, they were provided as an aggregate batch of over 55,000 files. There is
23 no indicia of which records were supposedly responsive to which CPRA requests that
24 were made by Riskin. TAS claimed a wide range of exemptions to records apparently

25
26 ³ Items (2) and (3), constituting what could be characterized as a document dump of tens of
27 thousands of pages and taking up gigabytes of space, are not attached here in their entirety out
28 of respect for the Court’s time and resources. Select pages are attached to the Declaration of
Adrian Riskin to Petitioner’s Memorandum of Points and Authorities in Support of Petition for
Writ of Mandamus, and are discussed in the arguments section.

1 withheld. Attachment item (1) *Exhibit K* to Skeels Dec. Riskin spent several days
2 examining the records, despite not having an apparent ability to determine which files
3 were responsive to which of the public records requests he had made. Riskin possesses a
4 number of records obtained from collateral CPRA requests made to other agencies in the
5 past that should have been in TAS' records production because they are responsive to the
6 requests made. Riskin took 19 of these records and conducted a thorough search for them
7 in the records provided by TAS. *Exhibit A* to Riskin Dec.; ¶¶20–21 Riskin Dec. Riskin was
8 unable to locate the corresponding public records in the production of records provided
9 by TAS.

10 On November 16, 2020, Riskin's attorney sent TAS an email with an enclosed letter
11 dated November 13, 2020, seeking, among other things, to address the issues of the broad
12 exemption claims and missing records. *Exhibit L* Skeels Dec. Riskin's attorney provided
13 information regarding two of the 19 records that should have been included in TAS'
14 production of responsive records:

- 15 1) An email from lfigueroa@ccsa.org to jwilliams@accelerated.org (and others) on
16 March 6, 2019 at 12:36 PM with subject: <Review Req'd> LAAC March Meeting
17 Agenda & Materials
- 18 2) An email from chorton@ccsa.org to jwilliams@accelerated.org (and others) on
19 September 19, 2018 at 10:09 AM with subject: <For Feedback/Approval by 7pm
20 Today> LAAC Collective Renewal Criteria Letter

21 *Exhibit L* Skeels Dec.; *Exhibit A* to Riskin Dec.; ¶¶20–21 Riskin Dec.

22 TAS responded with an email and attached letter on December 10, 2020,
23 broadening their claims of exemptions, and addressing the issue of missing responsive
24 records in regards to the information provided by Riskin. *Exhibit M* Skeels Dec. TAS was
25 able to locate and disclose the second record provided by Riskin as an example of
26 responsive records missing from TAS's production. TAS claimed they were unable to
27 locate the first example record, and provided no explanation as to why TAS did not have
28 the record in their possession. On January 12, 2021, Riskin's attorney notified TAS that

1 they would file notice and brief on schedule for this case. *Exhibit N* Skeels Dec. The
2 party's attorneys did meet and confer by telephone on January 14, 2021. ¶18 Skeels Dec.

3 **D. Status of Riskin's Public Records Requests**

4 **1. January 19, 2019 Request**

5 Riskin requested public records consisting of "emails along with their attachments
6 if any from 12/1/18 through 1/19/19 which are to or from board members or executive
7 staff of TAS which contain any of the following search terms: 1. UTLA 2. Strike 3. Monat
8 4. Yee 5. Benefits 6. Union 7. United 8. Bui 9. Goldstein" in their native electronic formats.
9 ¶10 Riskin Dec.; ¶8 12/3/19 Petition. The lengthy details of Riskin's interactions with
10 TAS regarding this request are chronicled in ¶¶9–14 12/3/19 Petition.

11 TAS provided records purportedly responsive to Riskin's request on October 30,
12 2020. *Exhibit K* Skeels Dec. However, Riskin has no way of determining which of the
13 over 55,000 records were intended to be responsive to this specific request, and has
14 concerns over the broad range of exemptions TAS is claiming. Moreover, this is one of the
15 requests to which Riskin holds responsive records from collateral sources that were not
16 present in TAS' October 30, 2020 production. The records in question contain the search
17 term "United", and fall within the date range specified in the request. *Exhibit A* Riskin
18 Dec., Bates stamped RISKIN0001 and RISKIN0022, respectively.

19 **2. January 24, 2019 Request**

20 Riskin requested public records consisting of "from 12/1/18 through 1/24/19
21 which are to or from board members or executive staff of TAS which are to or from any
22 email address at lausd.net or lacity.org" in their native electronic formats. ¶11 Riskin
23 Dec.; ¶15 12/3/19 Petition. The lengthy details of Riskin's interactions with TAS
24 regarding this request are chronicled in ¶¶16–21 12/3/19 Petition.

25 TAS provided records purportedly responsive to Riskin's request on October 30,
26 2020. *Exhibit K* Skeels Dec. However, Riskin has no way of determining which of the
27 over 55,000 records were intended to be responsive to this specific request, and has
28 concerns over the broad range of exemptions TAS is claiming.

3. March 24, 2019 Request

Riskin requested public records consisting of “to inspect, possibly to obtain copies of, records that will reveal the annual compensation, i.e. salary + benefits, of every employee of The Accelerated Schools as well as Board members if they are compensated. ¶¶ If any members of the administrative staff have employment contracts I would like to see copies of those as well.” ¶12 Riskin Dec.; ¶22 12/3/19 Petition. The lengthy details of Riskin’s interactions with TAS regarding this request are chronicled in ¶¶23-34 12/3/19 Petition.

TAS provided records purportedly responsive to Riskin's request on October 30, 2020. *Exhibit K* Skeels Dec. However, Riskin has no way of determining which of the over 55,000 records were intended to be responsive to this specific request, and has concerns over the broad range of exemptions TAS is claiming.

4. April 5, 2019 Request (First)

Riskin requested public records consisting of "I am seeking to inspect/obtain copies of all emails present in the following two accounts from January 1, 2014 through April 5, 2019 that are to/from/cc/bcc any email address at tribunemedia.com. [¶] jwilliams@accelerated.org [¶] amarshall@accelerated.org" in their native electronic formats. ¶13 Riskin Dec.; ¶36 12/3/19 Petition. The lengthy details of Riskin's interactions with TAS regarding this request are chronicled in ¶¶37-44 12/3/19 Petition.

TAS provided records purportedly responsive to Riskin's request on October 30, 2020. *Exhibit K* Skeels Dec. However, Riskin has no way of determining which of the over 55,000 records were intended to be responsive to this specific request, and has concerns over the broad range of exemptions TAS is claiming.

5. April 5, 2019 Request (Second)

Riskin requested public records consisting of "I am seeking to inspect/obtain copies of all emails present in the accounts jwilliams@accelerated.org or marshall@accelerated.org from January 1, 2018 through April 5, 2019 that are to/from/ cc/bcc: [¶] 1. any email address at ccsa.org [¶] 2. any member of the board of trustees" in

1 their native electronic formats. ¶14 Riskin Dec.; ¶45 12/3/19 Petition. The lengthy details
2 of Riskin’s interactions with TAS regarding this request are chronicled in ¶¶46–55
3 12/3/19 Petition.

4 TAS provided records purportedly responsive to Riskin’s request on October 30,
5 2020. *Exhibit K* Skeels Dec. However, Riskin has no way of determining which of the
6 over 55,000 records were intended to be responsive to this specific request, and has
7 concerns over the broad range of exemptions TAS is claiming. Moreover, this is another
8 one of the requests to which Riskin holds responsive records from collateral sources that
9 were not present in TAS’ October 30, 2020 production. **All of the collateral source**
10 **records** in question contain “to/from/cc/bcc” “any email address at ccsa.org”, and fall
11 within the date range specified in the request. *Exhibit A* Riskin Dec.

12 **6. April 6, 2019 Request**

13 Riskin requested public records consisting of “all emails related to TAS business
14 possessed by J. Williams in any account from January 1, 2018 through April 6, 2019 that
15 are to/from/cc/bcc Kevin Sved at any email address.” in their native electronic formats.
16 ¶15 Riskin Dec.; ¶56 12/3/19 Petition. The lengthy details of Riskin’s interactions with
17 TAS regarding this request are chronicled in ¶¶57–68 12/3/19 Petition.

18 TAS provided records purportedly responsive to Riskin’s request on October 30,
19 2020. *Exhibit K* Skeels Dec. However, Riskin has no way of determining which of the
20 over 55,000 records were intended to be responsive to this specific request, and has
21 concerns over the broad range of exemptions TAS is claiming.

22 **E. Relief Requested**

23 Respondent TAS belatedly produced purportedly responsive records in response
24 to the filing of the instant lawsuit. However, due to its dilatory conduct as well as
25 institutional incompetence, it has failed to produce all responsive, non-exempt records.
26 Petitioner Riskin filed his Cal. Gov’t Code §6259, subd. (a) Petition on December 3, 2019.
27 As to records not produced, Petitioner now seeks the Court’s order directing disclosure
28 of native format public records after conducting an **adequate search** responsive to each of

1 Petitioner's **discrete, separate** requests, a review of the records Respondent is claiming
2 are exempt, as well as the other prayers for relief requested in the 12/3/19 Petition.

3 **II. LEGAL STANDARD**

4 The Public Records Act... was enacted in 1968 and provides that 'every person has a
5 right to inspect any public record, except as hereafter provided.' (§6253, subd. (a).) We
6 have explained that the act was adopted 'for the explicit purpose of "increasing
7 freedom of information" by giving the public "access to information in possession of
8 public agencies.'" (*CBS, Inc. v. Block* (1986) 42 Cal.3d 646, 651. []) As the Legislature
9 declared in enacting the measure, 'the Legislature... finds and declares that access to
10 information concerning the conduct of the people's business is a fundamental and
11 necessary right of every person in this state.' (§6250.)" (*Roberts v. City of Palmdale*
12 (1993) 5 Cal. 4th 363, 370). *City of Los Angeles v. Superior Court (Axelrad)* (1996) 41 Cal.
13 App. 4th 1083, 1086.

14 Under the CPRA, if a record is a public record then it must be disclosed. §§6253,
15 subd. (a), 6256. The agency is required to respond to the request within ten days. §6253,
16 subd. (c). If the agency objects to disclosure, *the agency carries the burden of proof to show
17 that the requested records are exempt from disclosure.* §6255. If the agency fails to carry that
18 burden, the requested records *must be disclosed.* *New York Times v. Superior Court* (1990) 218
19 Cal. App. 3d 1579, 1586-87 (Court of Appeal reversed trial court because that court failed
20 "to place the burden on the agency to justify withholding the information sought" under
21 the CPRA); *Braun v. City of Taft* (1984) 154 Cal. App. 3d 332, 345 ("The burden of
22 demonstrating a need for nondisclosure is upon the agency claiming the right to
23 withhold the information.").

24 Not only the CPRA itself requires that exemptions to disclosure be narrowly
25 construed so as to favor disclosure, e.g., *Citizens for a Better Environment v. Dept. of Food &
26 Agriculture* (1985) 171 Cal. App. 3d 704, 711, but the California constitution also "direct[s]
27 the courts to broadly construe statutes that grant public access to government
information and to narrowly construe statutes that limit such access." *Long Beach Police
Officers Ass'n v. City of Long Beach* (2014) 59 Cal. 4th 59, 68 (citing Cal. Const., Art. I § 3
subd. (b)(2)).

28 The public interest in transparency and "ensuring accountability is particularly

1 strong where the discretion invested in a government official is unfettered" and where
2 "the degree of subjectivity involved in exercising the discretion cries out for public
3 scrutiny." *CBS, Inc. v. Block*, 42 Cal. 3d 646, 655, 725 P.2d 470 (1986).

4 Respondent has a **heavy burden** for justifying its refusal to produce the records
5 Petitioner seeks.

6 **III. ARGUMENT**

7 **A. Respondent is Subject to the California Public Records Act**

8 Respondent The Accelerated Schools is an entity established by Education Code §
9 47615, in the County of Los Angeles, State of California. TAS is a charter school
10 organization operating as a non-profit public-benefit corporation that operates three
11 schools authorized by the Los Angeles Unified School District ("LAUSD"). Respondent is
12 subject to the CPRA as a matter of state law 2018 Cal. AG LEXIS 13;,*1, 101 Ops. Cal.
13 Atty. Gen. 92, ["a California charter school and its governing body are subject to the
14 Ralph M. Brown Act and the California Public Records Act."]; Education Code
15 § 47604.1(b)(2)(A) ["A charter school and an entity managing a charter school shall be
16 subject to..." "The California Public Records Act (Chapter 3.5 (commencing with Section
17 6250) of Division 7 of Title 1 of the Government Code.)"]

18 **B. Requested Items Are Public Records Which Must Be Disclosed**

19 Emails, the records Petitioner seeks, fall within the definition of public records.
20 *City of San Jose v. Superior Court* (2017) 2 Cal. 5th 608, 617 ("It is undisputed that the items
21 at issue here [emails] constitute writings."); §6252, subd. (e) (public records include "any
22 writing containing information" "regardless of physical form or characteristics." *See also*
23 §6254.9, subd. (d) ("Public records stored in a computer shall be disclosed as required by
24 this chapter.") Furthermore, they are in Respondent's possession. As Petitioner has met
25 its burden of proof, the burden shifts to Respondent to demonstrate the records are
26 exempt. Respondent cannot meet its burden.

27 **C. Strong Public Interest in Disclosure**

28 In an effort to monitor the workings of TAS, other charter schools, and the

1 California Charter Schools Association (“CCSA”), and disseminate his findings on his
2 website, Petitioner has utilized the CPRA. The materials on Petitioner’s website are
3 available for free to the public. He has been quoted in the *Los Angeles Times* and his
4 website linked to in various articles.⁴ His website is frequently cited by Former U.S.
5 Assistant Secretary of Education and current New York University Professor Diane
6 Ravitch.⁵ Ravitch disseminates information uncovered by Riskin’s CPRA requests
7 Charters nationally. Parent activists have used information uncovered by Petitioner’s
8 CPRA requests to start petitions and write disability advocacy articles.⁶ Petitioner has
9 also been contacted by documentary film makers, public interest attorneys, and students
10 from Boalt Hall’s Policy Advocacy Clinic who have utilized information on his website
11 for their projects. ¶2-9. Riskin Dec. Moreover Riskin’s first request came on the heels of a
12 contentious and high-profile strike by TAS teachers. See footnote 1 *supra*. ***Public interest***
13 ***is extremely high in disclosure.***

14 **D. Exemptions Claimed by Respondent are Inapposite and Overbroad**

15 TAS’ October 30, 2020 letter accompanying their initial production of records
16 claimed that they were withholding responsive records under the exemptions granted by
17 Section 6252(e), Section 6254, subdivisions (a), (c), (k), and Section 6255. Attachment item
18 (1) ***Exhibit K*** to Skeels Dec (“10/30/20 Letter”). TAS’ December 10, 2020 letter restated
19 the above exemptions from their October 30, 2020 and added the Family Educational
20

21 ⁴ See “Memo to charter leaders: ‘It’s better to be feared than loved. Right now we are neither’”
22 <https://www.latimes.com/local/lanow/la-me-edu-charter-leaders-confidential-planning-20190702-story.html> [as of January 20, 2021]; “L.A. charter schools’ plans: Take back
23 mayor’s office, sue district, battle teachers union” <https://www.latimes.com/local/lanow/la-me-edu-secret-plan-for-charters-20190702-story.html> [as of January 20, 2021]

24 ⁵ A listing of articles on Professor Diane Ravitch’s blog featuring Petitioner’s website: <https://dianeravitch.net/?s=michaelkohlhaas.org>

25 ⁶ See e.g. “Public School Families’ Investigate Nick Melvoin petition” <https://www.change.org/p/lausd-school-board-investigate-nick-melvoin> [as of January 20, 2021]; “Charter Schools Vs. Public School Students” https://medium.com/age-of-awareness/charter-schools-vs-public-school-students-f0895b6c9586?source=friends_link&sk=a9b6669e32dce05f8246b04a0dff7ae4 [as of January 20, 2021]

1 Rights and Privacy Act (“FERPA”) to their claimed exemptions. Attachment ***Exhibit M*** to
2 Skeels Dec. (12/10/20 Letter). Before discussing the law applicable to these claimed
3 exemptions, the very nature of the requests are somewhat dispositive of how most of
4 these claims are inapposite. Riskin’s January 24, 2019, April 5, 2019 (first and second), and
5 April 6, 2019 requests all were in regards to emails to outside entities. ¶11; ¶¶13–15
6 Riskin Dec. It’s hard to imagine applicable exemptions under FERPA or deliberative
7 processes where the correspondence is with outside, non-educational entities like
8 tribunemedia.com, ccsa.org, or the lacity.org.

9 TAS claims exemptions under § 6254(k), and cites “the disclosure of which is
10 exempted or prohibited under federal and state law, including but not limited to
11 provisions of the evidence code relating to privilege.” 10/30/20 Letter. However
12 § 6254(k) is not a blanket or independent exemption. “It merely incorporates other
13 prohibitions established by law.” *County of Santa Clara v. Superior Court* (2009) 170
14 Cal.App.4th 1301, 1320, 89 Cal.Rptr.3d 374. As such, the courts have found that § 6255(a)
15 requirement to specify the actual exemption claimed under Govt. Code § 6254(k) applies
16 *San Diego County Employees Retirement Assn. v. Superior Court* (2011) 196 Cal.App.4th 1228,
17 1236 [127 Cal.Rptr.3d 479, 485][“The agency shall justify withholding any record by
18 demonstrating that the record in question is exempt under express provisions of this
19 chapter...”].

20 Likewise, TAS claims of “deliberative processes” privilege is subject to scrutiny. In
21 addition the fact that most of the records requested involved correspondence with
22 outside agencies, any and all records TAS is claiming fall under the deliberative processes
23 privilege “must be both predecisional and deliberative” and that TAS has the burden to
24 identify the decision or policy the record was part of, or prove the record’s role in the
25 deliberative process. *Times Mirror Co. v. Superior Court* (1991) 53 Cal.3d 1325, 1352 [283
26 Cal.Rptr. 893, 910, 813 P.2d 240, 257].

27 TAS also cites §§ 6254(a) and 6255 quoting the statutory language “the public
28 interest served by not disclosing the record clearly outweighs the public interest served

1 by disclosure of the record." However, "The burden of proof is on the proponent of
2 nondisclosure, who must demonstrate a 'clear overbalance' on the side of confidentiality.
3 [Citations.] The purpose of the requesting party in seeking disclosure cannot be
4 considered..." *California State University v. Superior Court* (2001) 90 Cal.App.4th 810, 831
5 [108 Cal.Rptr.2d 870, 884]. Given the high profile of TAS' activities during the period
6 records were requested, and its relationships and correspondence with the CCSA and
7 LAUSD, the public interest in disclosure, as discussed in **III.C.** above, is quite high.

8 Ultimately, "...all exemptions are narrowly construed. [Citations.] The agency
9 opposing disclosure bears the burden of proving that an exemption applies. [Citation.]"
10 *County of Santa Clara v. Superior Court* (2009) 170 Cal.App.4th 1301, 1321 [89 Cal.Rptr.3d
11 374, 388–389], as modified (Feb. 27, 2009). The Court, after reviewing the disputed
12 records in camera, should order Respondent to disclose all requested responsive public
13 records that are not properly exempted under the CPRA.

14 **E. Respondent TAS Has Not Conducted an Adequate Search**

15 After waiting 650 days from his first CPRA request to TAS, Riskin was provided a
16 document dump in which he is unable to reasonably discern which records TAS intended
17 to be responsive to each of his six distinct, separate requests as outlined in **I.D.** *supra*.

18 Ordinarily, upon receipt of a CPRA request, an agency must search for requested
19 records; it is obliged to assist the requestor and to disclose records it can locate with
20 reasonable effort. The search must be "'reasonably calculated to locate responsive
21 documents.'" *City of San Jose v. Superior Court* (2017) 2 Cal. 5th 608, 627; Gov't Code §
22 6253. Furthermore, the accepted standard is that the agency will "make reasonable efforts
23 towards clarification and production." *Community Youth Athletic Center v. City of National
24 City* (2013) 220 Cal. App. 4th 1385, 1418. Here, there was never an attempt by TAS to
25 clarify with Petitioner, although there is little need for clarification. Petitioner's CPRA
26 requests are clear and simple: the records he seeks are emails and for each request he
27 provided date range and either a keyword or sender/ recipient.

28 //

1. Search was not reasonably calculated to locate responsive documents

2 As outlined under I.C., I.D.1., and I.D.5. *supra*, Riskin holds responsive records
3 from collateral sources that were not present in TAS' October 30, 2020 production, 19 of
4 which are attached as ***Exhibit A*** to Riskin Dec.; ¶¶20–21 Riskin Dec. Petitioner went as
5 far as to provide TAS with two examples of records missing from the production in order
6 to assist TAS in conducting a proper search. ***Exhibit L*** to Skeels Dec. TAS was thus on
7 notice that they had not conducted an adequate search and should have done so at that
8 point. Instead, TAS located and disclosed the one record and claimed they were unable to
9 locate the other record, providing no explanation as to why they did not have the record
10 in their possession. All 19 responsive records from collateral sources are responsive to
11 Riskin's second April 5, 2019 request, and two are responsive to his January 19, 2019
12 request ¶14 & ¶10 Riskin Dec. Clearly TAS did not reasonably calculate its search to
13 locate responsive records *City of San Jose* 2 Cal. 5th 608 at 627. Moreover, it is more than a
14 little suspect that *all* of the currently known "omitted" records were to or from the CCSA
15 trade association, most of them involving political activities aimed at pressuring LAUSD.
16 These are specifically the sort of records that Petitioner is seeking. ¶2 Riskin Dec.

17 Additionally, TAS produced records that are, in the absence of a careful search and
18 accounting of which records were responsive to which request, seemingly non-
19 responsive records. Petitioner included two such records (TAS Bates stamped TAS00072
20 and TAS00750) attached as *Exhibit B* to Riskin Dec. Neither record on their face seem
21 responsive to any of Riskin's six separate CPRA requests. TAS00750 is titled "The
22 Accelerated Schools Title IX Policy", which Petitioner states "may have been an
23 attachment to a responsive email, but there is no way of telling." ¶22 Riskin Dec.
24 Petitioner lists in detail the process he used to try and determine why the record was
25 included. ¶22 Riskin Dec.

26 Ultimately, it is not the Petitioner's burden to demonstrate to Respondent which
27 records were missing from or were extraneously included in the records production. It is
28 the Respondent's legal duty to conduct an adequate search, and provide all nonexempt

1 responsive records. Had TAS had questions about the requests, they should have asked
2 those questions and clarified the issues prior to production. *Community Youth Athletic*
3 *Center* 220 Cal. App. 4th 1385 at 1418.

4 **IV. CONCLUSION**

5 For the foregoing reasons, Petitioner respectfully requests that the Court grant the
6 Petition.

7
8 DATED: January 21, 2021

9
10 Respectfully Submitted,

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13 Robert D. Skeels

14 Attorney for Petitioner and Plaintiff

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DECLARATION OF ADRIAN RISKIN

I, ADRIAN RISKIN, declare:

1. I am the Petitioner and Plaintiff in this action.

2. In an effort to monitor, investigate, and understand the activities and inner workings of charter school corporations (“Charters”), their trade association the California Charter Schools Association (“CCSA”), their political influence on the Los Angeles Unified School District (“LAUSD”), and the relationship between those entities, and share my findings on my website michaelkohlhaas.org, I make public records requests pursuant to the CPRA.

3. I collect and publish documents about municipal politics in Los Angeles that I receive in response to CPRA requests. One of my areas of focus is Charters. The materials published on my website are available for free to the public.

4. I have been quoted in the *Los Angeles Times* and my website linked to in various articles. On July 2, 2019 documents I obtained through the CPRA were referenced in two separate *Los Angeles Times* articles regarding charter schools and the articles linked directly to my website.

5. My website is frequently cited and linked to by former U.S. Assistant Secretary of Education and current New York University Professor Diane Ravitch on her blog, which disseminates information about Charters nationally.

6. Information documents I obtained through the CPRA led to the discovery that a LAUSD Board Member had potentially disclosed confidential school district legal strategies to the CCSA. Parent groups organized a petition in response to that discovery.

7. Parent activists advocating for students with disabilities have written about how charter schools and the CCSA tried to undermine efforts to “to make schools more accessible to disabled students” using information I obtained through CPRA requests.

8. I have also been contacted by documentary film makers, public interest attorneys, and students from Boalt Hall's Policy Advocacy Clinic who have utilized information on my website for their projects.

1 9. In 2019, I submitted six separate requests for public documents to The
2 Accelerated Schools' ("TAS").

3 10. On January 19, 2019 I submitted a request public records consisting of
4 "emails along with their attachments if any from 12/1/18 through 1/19/19 which are to
5 or from board members or executive staff of TAS which contain any of the following
6 search terms: 1. UTLA 2. Strike 3. Monat 4. Yee 5. Benefits 6. Union 7. United 8. Bui 9.
7 Goldstein" in their native electronic formats.

8 11. On January 24, 2019 I submitted a request for public records "from 12/1/18
9 through 1/24/19 which are to or from board members or executive staff of TAS which are
10 to or from any email address at lausd.net or lacity.org" in their native electronic formats.

11 12. On March 24, 2019 I submitted a request for public records "to inspect,
12 possibly to obtain copies of, records that will reveal the annual compensation, i.e. salary
13 + benefits, of every employee of The Accelerated Schools as well as Board members if
14 they are compensated. [¶] If any members of the administrative staff have employment
15 contracts I would like to see copies of those as well."

16 13. On April 5, 2019, I submitted a request for public records "I am seeking to
17 inspect/obtain copies of all emails present in the following two accounts from January 1,
18 2014 through April 5, 2019 that are to /from /cc /bcc any email address at
19 tribunemedia.com. [¶] jwilliams@accelerated.org [¶] amarshall@accelerated.org" in their
20 native electronic formats.

21 14. On April 5, 2019, I submitted a request for public records "I am seeking to
22 inspect/obtain copies of all emails present in the accounts jwilliams@accelerated.org or
23 marshall@accelerated.org from January 1, 2018 through April 5, 2019 that are to /from /
24 cc /bcc: [¶] 1. any email address at ccsa.org [¶] 2. any member of the board of trustees" in
25 their native electronic formats.

26 15. On April 6, 2019, I submitted a request for public records "all emails related
27 to TAS business possessed by J. Williams in any account from January 1, 2018 through
28 April 6, 2019 that are to /from /cc /bcc Kevin Sved at any email address." in their native

1 electronic formats.

2 16. I made repeated attempts to get TAS to follow the CPRA for each of my
3 requests. I emailed TAS to reading them of statutory deadlines. I sent them passages from
4 the CPRA to aid with compliance. I sent TAS relevant findings from case law. I
5 continually extended my own deadlines for considering TAS' lack of production a refusal
6 and filing a lawsuit. I further extended my deadlines in an attempt to allow the new TAS
7 leadership to comply with the CPRA.

8 17. On December 3, 2019, I filed my California Public Records Act Petition
9 (12/3/19 Petition).

10 18. All exhibits to the 12/3/19 Petition that are emails to or from me and
11 various TAS employees and TAS trustees are true and correct copies of those emails.

12 19. All exhibits to the 12/3/19 Petition that are emails to or from me and
13 various TAS employees and TAS trustees are true and correct copies of those emails.

14 20. Attached as *Exhibit A* are true and correct copies of 19 emails I provided
15 my attorney with as examples of records I possess from collateral sources that should
16 have been present in the responsive records provided by TAS on October 30, 2020.

17 21. On November 1, 2020 I did a thorough search through the records provided
18 by TAS on October 30, 2020 for the records discussed in ¶20. I was unable to locate the
19 corresponding, responsive records in TAS' production of records.

20 22. Attached as *Exhibit B* are true and correct copies of 2 records provided by
21 TAS on October 30, 2020 that don't seem to meet of the search criteria of any of my six
22 public records requests. One of them, "TAS00750.pdf", may have been an attachment to a
23 responsive email, but there is no way of telling. Here is the process I used to try and
24 locate the email TAS00750.pdf was associated with: A) I checked the metadata of the file
25 to see if the original filename was included, but found that on February 14, 2020, when
26 TAS created the file, they erased the original metadata so that the original name of the file
27 is not recoverable through this method. B) The document says that it was approved by
28 the board on October 31, 2017. Using the powerful search capabilities built into Mozilla

1 Thunderbird I searched for emails with attachments dated between October 1, 2017 and
2 December 31, 2017. There were no results. C) I expanded the search to include dates
3 through December 31, 2018 and got 314 matches. D) I added a criterion requiring that the
4 filename of the attachments include the string "IX" case insensitive and got zero results.
5 E) I attempted a visual inspection of the 314 matches with no criteria on the filename but
6 was unable to identify this particular file. It may be in there, but I am unable to find it
7 using software and clearly humans are too fallible to draw conclusions from my inability
8 to visually locate the record.

9 I declare under penalty of perjury under the laws of the State of California that the
10 foregoing is true and correct.

11 Executed on this the 20th day of January, 2021 in Los Angeles, California.

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16 Adrian Riskin
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Exhibit A

Subject: <Confidential/ Please Read> Friday's Authorizing and Oversight Policy Meeting at CCSA

From: Cassy Horton

Date: 3/21/18, 12:17 PM

To: Oliver Sicat <osicat@ednovate.org>, "agoldring@laleadership.org" <agoldring@laleadership.org>, "ellavan@laalliance.org" <ellavan@laalliance.org>, "lbrianza@kippla.org" <lbrianza@kippla.org>, Annabelle Eliashiv <annabelle.eliashev@greendot.org>, Ana Ponce <aponce@caminonuevo.org>, "ykingberg@ypics.org" <ykingberg@ypics.org>, Vanessa Jackson <vanessajackson@collegiatecharterhighschool.org>, "emorris@endeavorcollegeprep.org" <emorris@endeavorcollegeprep.org>, "emorris@endeavorcollegeprep.org" <emorris@endeavorcollegeprep.org>, "Elena Paul" <E.Paul@birminghamcharter.com>, Liza Bercovici <liza@gabri.org>, "Emilio Pack" <epack@stem-prep.org>, C DeJesus <cdejesus@greendot.org>, D Katir <dkatzir@laalliance.org>, P Hudnut <phudnut@icefps.org>, Johnathan Williams <jwilliams@accelerated.org>, Marcia Aaron <maaron@kippla.org>, "Rhonda Deomampo" <rdeomampo@wearesynergy.org>, Carrie Wagner <cwagner@galsla.org>, "gscott@polahs.net" <gscott@polahs.net>, "Lopez, Cesar" <clopez@apexacademyhs.info>, Mark Kleger-Heine <mkleger-heine@cwlosangeles.org>, Hrag Hamalian <hhamalian@brightstarschools.org>, Zainab Ali <zali@laalliance.org>

CC: Jennie Shin <jshin@ccsa.org>, =?Windows-1252?Q?Keith_Dell=92Aquila?= <KDellAquila@ccsa.org>

Hi everyone,

I ask that you please do not forward or otherwise share this email or its content.

I am writing to provide information about Friday morning's meeting focused on making student-centered updates to local charter authorizing and oversight policy, which will take place at the CCSA offices. We request your presence because you have either been involved in the LAAC's Oversight Working Group, or the recently convened Applicable Policies Working Group with the District. If you are not able to attend in-person, please let me know as soon as possible so we can find an alternate time to brief you.

We are excited to bring all of you together on behalf of the charter community to continue our momentum and stay united in voice and action to make policy changes that benefit all students!

A proposed agenda for Friday's conversation is attached.

Purpose and Context for Friday's Conversation

Our goal on Friday will be to unite the efforts of the Oversight Policy Working Group, which informs the LAAC's policy priorities, with the Applicable Policies Working Group so that our continued efforts to improve local authorizing are grounded in the foundational work folks have done over the past two years, aligned with the most critical needs of the broader charter community, and are inclusive of the broader perspective of LA charter leaders.

We have asked you to be present and in-person for two reasons: 1) Some information is still sensitive and changing. 2) We've learned that the most effective collective action occurs when our leaders are aligned, understand each other, and trust each other. That happens best in-person.

Background: Opportunity to United in Voice and Action to Improve Authorizing and Oversight Policy

We anticipate that the April 3 LAUSD Board Meeting will present two opportunities for us to advance changes to LAUSD charter policy:

* First, Dr. Rodriguez and Dr. Vladovic have indicated that they plan to introduce resolution calling for the Superintendent to restart a

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Charter Schools Collaborative and directing the Superintendent, working with the Collaborative, to propose a revised a Board Policy on Charter School Authorization. This is something that the Oversight Working Group, LAAC, CCSA, and broader charter community have been working to achieve for years, and it is important those voices continue to inform and drive this work.

* On a separate, but parallel track, the Board will vote on whether to approve the Superintendent's recommendations that are the output of the recently-convened Applicable Policies Working Group, a collective of charter school leaders and District staff, led by Frances Gipson. The group was convened as a follow-up to the DRL negotiations in the fall to generate, for the first time, a list of what policies the District considers to be "applicable" to charter schools as referenced in the District Required Language. That group has also been working to achieve charter community goals, including securing the same DRL for all schools and ensuring the DRL is board-approved.

Thanks to the respective contributions and leadership of the LAAC, Oversight Working Group, and Applicable Policies Working Group charter community is incredible progress towards securing student-focused updates on authorizing and oversight policy. We know that these efforts have been successful because we have thought about the needs of the charter community, and come together in voice and action to secure positive changes. We believe that unifying the efforts of these groups is a critical step to take to move this work forward.

The Friday conversation will serve to bring us together to better understand the opportunities ahead of us, build trust, and commit to a path forward that achieves policy changes at LAUSD that are informed by both groups' work and the input of the broader charter community.

If you have questions, please let me know. We look forward to seeing you Friday!

Cassy

Cassy Horton
Managing Director, Regional Advocacy, Greater Los Angeles
California Charter Schools Association
Cell: 213-926-7763
Email: chorton@ccsa.org <<mailto:chorton@ccsa.org>>
Website: www.ccsa.org <<http://www.ccsa.org/>>

The 25th Annual California Charter Schools Conference is now only a few weeks away. Register today https://charterconference.org/2018/registration/01_type.php ! Our complete breakout and poster session lineup <https://charterconference.org/2018/program/search.php> is now available on the conference website. The conference will be held March 26-28, 2018 at the San Diego Convention Center.

Subject: <URGENT REQUEST> Letters of Opposition to Harmful Legislation

From: Keith Dell'Aquila

Date: 4/11/18, 11:51 AM

To: "ddonette@cwcclosangeles.org" <ddonette@cwcclosangeles.org>, J Elliot <j.elliott@pucschools.org>, Oliver Sicat <osicat@ednovate.org>, bbauer <bbauer@ghchs.com>, Valerie Braimah <vbraimah@citycharterschools.org>, "emorris@endeavorcollegeprep.org" <emorris@endeavorcollegeprep.org>, "Irene Sumida" <isumida@fentoncharter.net>, C DeJesus <cdejesus@greendot.org>, "Ana Ponce" <Ana.Ponce@caminonuevo.org>, "erin.studer@chimeinstitute.org" <erin.studer@chimeinstitute.org>, "pmagee@palihigh.org" <pmagee@palihigh.org>, P Hudnut <phudnut@icefps.org>, "ykingberg@ypics.org" <ykingberg@ypics.org>, Vanessa Jackson <vanessajackson@collegiatecharterhighschool.org>, Marcia Aaron <maaron@kippla.org>, C Young <cyoung@magnoliapublicschools.org>, "epack@stem-prep.org" <epack@stem-prep.org>, Johnathan Williams <jwilliams@accelerated.org>, "lbrianza@kippla.org" <lbrianza@kippla.org>, "ellavan@laalliance.org" <ellavan@laalliance.org>, "agoldring@laleadership.org" <agoldring@laleadership.org>, Carrie Wagner <cwagner@galsla.org>, Zainab Ali <zali@laalliance.org>, "Lopez, Cesar" <clopez@apexacademyhs.info>, Rhonda Deomampo <rdeomampo@wearesynergy.org>, Hrag Hamalian <hhamalian@brightstarschools.org>, Elena Paul <E.Paul@birminghamcharter.com>, "gscotti@polahs.net" <gscotti@polahs.net>, Liza Bercovici <liza@gabri.org>, Annabelle Eliashiv <annabelle.eliashev@greendot.org>, D Katzir <dkatzir@laalliance.org>, "Mark Kleger-Heine" <mkleger-heine@cwcclosangeles.org>, Richard Thomas <rthomas@nhcharteracademy.com>, Elizabeth Saiger <esaiger@ednovate.org>
CC: Manny Aceves <maceves@kippla.org>, Cassy Horton <chorton@ccsa.org>, "Ebony Wheaton" <ewheaton@ccsa.org>

Members of the LAAC and Applicable Policies/Oversight Working Groups,

This week, SB 1362—the biggest legislative threat to charter schools this session—was amended for the worse. If this bill passes, we will face tripled oversight fees, greatly expanded legal grounds for denial, and significantly longer petition review and appeal timelines that threaten our appeal pathways.

We need you to help us kill SB 1326 in the Senate Education Committee. Can you take 10 minutes to send a letter of opposition on your school letterhead and with your signature to me by 3pm Thursday? We'll compile these letters with other schools from across the state and submit them to the Education Committee on your behalf. A template letter is attached to this email.

LA-area Senator Ben Allen chairs this committee, so a strong showing of opposition from LA schools is critical. The Committee will vote on this bill next Wednesday, and letters are due this week.

For those of you who have received conduit bond financing (non-profit bonds issued through CSFA) in the past or may consider it in the future, your opposition to AB 3222 would also be helpful. AB 3222 would significantly increase the cost of future charter facilities projects by as much as 20 percent. A letter of opposition to this bill is also attached. More details, including a list of schools having used this financing in the past, are below.

Please reach out with questions. Thank you for your continued advocacy as we fight for our schools and students,

Keith Dell'Aquila

More Background on SB 1362 (Beall)
https://leginfo.legislature.ca.gov/faces/billTextClient.xhtml?bill_id=201720180SB1362 – Charter Authorization and Oversight

This bill is a reworking of some of the major anti-charter bills we've seen in past years, including SB 808. SB 1362 would allow an authorizer

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to deny a charter school it is "not in the best interests of the pupils of the community." This condition is so ill-defined and subjective that it could lend itself to the denial of any charter by a politically-motivated district. The bill would also permit authorizers to triple oversight fees from 1% to 3%, with schools utilizing Prop 39 facilities paying up to 6%. Additionally, it requires all petitioners to undergo capacity interviews, expands the petition review timeline from 60 to 90 days, and counts only schooldays (rather than actual days) during the review. Practically, this means a new petition submitted to LAUSD in August would not have a decision until about winter break, a County appeal wouldn't be heard until the spring, and a state appeal would be impossible.

More Background on AB 3222 (O'Donnell)

<https://leginfo.legislature.ca.gov/faces/billTextClient.xhtml?bill_id=201720180AB3222> – Conduit Bond Financing

This bill requires that prevailing wages be paid on any charter facilities projects funded in whole or in part by conduit bonds (non-profit bonds issued through CSFA) and would significantly increase the cost of future charter facilities projects by as much as 20 percent. There are already significant barriers to a charter school's ability to access affordable facilities and facilities financing, and AB 3222 would create yet another barrier.

According to state records, many LA charter schools have received conduit bond financing in the past seven years, including: Alliance, Alta Public Schools, Aspire, Birmingham, Bright Star, Camino Nuevo, City Charter, Granada Hills, Green Dot, ICEF, KIPP, New Designs, Magnolia, Ocean Charter , PUC Schools, TEACH, Value Schools, and Vaughn.

Keith Dell'Aquila

Director, Regional Advocacy, Greater Los Angeles

213-864-6310 | kdellaquila@ccsa.org <<mailto:kdellaquila@ccsa.org>>

RISKIN0004

Subject: RE: <URGENT REQUEST> Letters of Opposition to Harmful Legislation

From: Cassy Horton

Date: 4/11/18, 12:43 PM

To: =?utf-8?B?S2VpdGggRGVsbOKAmUFxdWlsYQ==?= <KDellAquila@ccsa.org>, "ddonette@cwclosangeles.org" <ddonette@cwclosangeles.org>, J Elliot <j.elliott@pucschools.org>, Oliver Sicat <osicat@ednovate.org>, bbauer <bbauer@ghchs.com>, Valerie Braimah <vbraimah@citycharterschools.org>, "emorris@endeavorcollegeprep.org" <emorris@endeavorcollegeprep.org>, "Irene Sumida" <isumida@fentoncharter.net>, C DeJesus <cdejesus@greendot.org>, "Ana Ponce" <Ana.Ponce@caminonuevo.org>, "erin.studer@chimeinstitute.org" <erin.studer@chimeinstitute.org>, "pmagee@palihigh.org" <pmagee@palihigh.org>, P Hudnut <phudnut@icefps.org>, "ykingberg@ypics.org" <ykingberg@ypics.org>, Vanessa Jackson <vanessajackson@collegiatecharterhighschool.org>, Marcia Aaron <maaron@kippla.org>, C Young <cyoung@magnoliapublicschools.org>, "epack@stem-prep.org" <epack@stem-prep.org>, Johnathan Williams <jwilliams@accelerated.org>, "lbrianza@kippla.org" <lbrianza@kippla.org>, "ellavan@laalliance.org" <ellavan@laalliance.org>, "agoldring@laleadership.org" <agoldring@laleadership.org>, Carrie Wagner <cwagner@galsla.org>, Zainab Ali <zali@laalliance.org>, "Lopez, Cesar" <clopez@apexacademyhs.info>, Rhonda Deomampo <rdeomampo@wearesynergy.org>, Hrag Hamalian <hhamalian@brightstarschools.org>, Elena Paul <E.Paul@birminghamcharter.com>, "gscotti@polahs.net" <gscotti@polahs.net>, Liza Bercovici <liza@gabri.org>, Annabelle Eliashiv <annabelle.eliashev@greendot.org>, D Katzir <dkatzir@laalliance.org>, "Mark Kleger-Heine" <mkleger-heine@cwclosangeles.org>, Richard Thomas <rthomas@nhcharteracademy.com>, Elizabeth Saiger <esaiger@ednovate.org>
CC: Manny Aceves <maceves@kippla.org>, Ebony Wheaton <ewheaton@ccsa.org>

Hi everyone,

10 minutes of your time between now and end of day tomorrow to send these letters will make a tremendous impact!

For quick context, we have been thoughtful about protecting you from multiple requests at the same time, and prioritizing what ways you can contribute that are most impactful at any given moment in time.

After successfully navigating through yesterday's board meeting thanks to your tremendous local advocacy efforts, we recognize LA can make a major impact on Statewide politics that are also moving very quickly at the State. SB 1362 has gotten worse through amendments over recent days, and now is the right time for us to fight back.

Thank you in advance for your ongoing support. We appreciate all of you!

Cassy Horton

Managing Director, Regional Advocacy, Greater Los Angeles

California Charter Schools Association

Cell: 213-926-7763

Email: chorton@ccsa.org <mailto:chorton@ccsa.org>

From: Keith Dell'Aquila
Sent: Wednesday, April 11, 2018 11:51 AM
To: ddonette@cwclosangeles.org; J Elliot j.elliott@pucschools.org; Oliver Sicat osicat@ednovate.org; bbauer bbauer@ghchs.com; Valerie Braimah vbraimah@citycharterschools.org; emorris@endeavorcollegeprep.org; Irene Sumida <isumida@fentoncharter.net>; C DeJesus <cdejesus@greendot.org>; Ana Ponce <Ana.Ponce@caminonuevo.org>; erin.studer@chimeinstitute.org; pmagee@palihigh.org; P Hudnut <phudnut@icefps.org>; ykingberg@ypics.org; Vanessa Jackson <vanessajackson@collegiatecharterhighschool.org>; Marcia Aaron <maaron@kippla.org>; C Young <cyoung@magnoliapublicschools.org>; epack@stem-prep.org; Johnathan Williams <jwilliams@accelerated.org>;

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lbrianza@kippla.org; ellavan@laalliance.org; agoldring@laleadership.org; Carrie Wagner scwagner@galsla.org; Zainab Ali zali@laalliance.org; Lopez, Cesar clopez@apexacademyhs.info; Rhonda Deomampo rdeomampo@wearesynergy.org; Hrag Hamalian hhamalian@brightstarschools.org; Elena Paul E.Paul@birminghamcharter.com; gscott@polahs.net; Liza Bercovici liza@gabri.org; Annabelle Eliashiv annabelle.eliashev@greendot.org; D Katzir dkatzir@laalliance.org; Mark Kleger-Heine mkleger-heine@wclosangeles.org; Richard Thomas rthomas@nhcharteracademy.com; Elizabeth Saiger esaiger@ednovate.org Cc: Manny Aceves maceves@kippla.org; Cassy Horton chorton@ccsa.org; Ebony Wheaton ewheaton@ccsa.org Subject: <URGENT REQUEST> Letters of Opposition to Harmful Legislation

Members of the LAAC and Applicable Policies/Oversight Working Groups,

This week, SB 1362—the biggest legislative threat to charter schools this session—was amended for the worse. If this bill passes, we will face tripled oversight fees, greatly expanded legal grounds for denial, and significantly longer petition review and appeal timelines that threaten our appeal pathways.

We need you to help us kill SB 1326 in the Senate Education Committee. Can you take 10 minutes to send a letter of opposition on your school letterhead and with your signature to me by 3pm Thursday? We'll compile these letters with other schools from across the state and submit them to the Education Committee on your behalf. A template letter is attached to this email.

LA-area Senator Ben Allen chairs this committee, so a strong showing of opposition from LA schools is critical. The Committee will vote on this bill next Wednesday, and letters are due this week.

For those of you who have received conduit bond financing (non-profit bonds issued through CSFA) in the past or may consider it in the future, your opposition to AB 3222 would also be helpful. AB 3222 would significantly increase the cost of future charter facilities projects by as much as 20 percent. A letter of opposition to this bill is also attached. More details, including a list of schools having used this financing in the past, are below.

Please reach out with questions. Thank you for your continued advocacy as we fight for our schools and students,

Keith Dell'Aquila

More Background on SB 1362 (Beall)
https://leginfo.legislature.ca.gov/faces/billTextClient.xhtml?bill_id=201720180SB1362 – Charter Authorization and Oversight

This bill is a reworking of some of the major anti-charter bills we've seen in past years, including SB 808. SB 1362 would allow an authorizer to deny a charter school if it is "not in the best interests of the pupils of the community." This condition is so ill-defined and subjective that it could lend itself to the denial of any charter by a politically-motivated district. The bill would also permit authorizers to triple oversight fees from 1% to 3%, with schools utilizing Prop 39 facilities paying up to 6%. Additionally, it requires all petitioners to undergo capacity interviews, expands the petition review timeline from 60 to 90 days, and counts only schooldays (rather than actual days) during the review. Practically, this means a new petition submitted to LAUSD in August would not have a decision until about winter break, a

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County appeal wouldn't be heard until the spring, and a state appeal would be impossible.

More Background on AB 3222 (O'Donnell)

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This bill requires that prevailing wages be paid on any charter facilities projects funded in whole or in part by conduit bonds (non-profit bonds issued through CSFA) and would significantly increase the cost of future charter facilities projects by as much as 20 percent. There are already significant barriers to a charter school's ability to access affordable facilities and facilities financing, and AB 3222 would create yet another barrier.

According to state records, many LA charter schools have received conduit bond financing in the past seven years, including: Alliance, Alta Public Schools, Aspire, Birmingham, Bright Star, Camino Nuevo, City Charter, Granada Hills, Green Dot, ICEF, KIPP, New Designs, Magnolia, Ocean Charter , PUC Schools, TEACH, Value Schools, and Vaughn.

Keith Dell'Aquila

Director, Regional Advocacy, Greater Los Angeles

213-864-6310 | kdellaquila@ccsa.org <<mailto:kdellaquila@ccsa.org>>

Subject: <Reminder> Submit Letters to CCSA Today Opposing Charter-Killer Bill in Sacramento

From: Cassy Horton

Date: 4/12/18, 9:09 AM

To: "ddonette@cwcloseangeles.org" <ddonette@cwcloseangeles.org>, J Elliot <j.elliott@pucschools.org>, Oliver Sicat <osicat@ednovate.org>, bbauer <bbauer@ghchs.com>, Valerie Braimah <vbraimah@citycharterschools.org>, "emorris@endeavorcollegeprep.org" <emorris@endeavorcollegeprep.org>, "Irene Sumida" <isumida@fentoncharter.net>, C DeJesus <cdejesus@greendot.org>, "Ana Ponce" <Ana.Ponce@caminonuevo.org>, "erin.studer@chimeinstitute.org" <erin.studer@chimeinstitute.org>, "pmagee@palihigh.org" <pmagee@palihigh.org>, P Hudnut <phudnut@icefps.org>, "ykingberg@ypics.org" <ykingberg@ypics.org>, Vanessa Jackson <vanessajackson@collegiatecharterhighschool.org>, Marcia Aaron <maaron@kippla.org>, C Young <cyoung@magnoliapublicschools.org>, "epack@stem-prep.org" <epack@stem-prep.org>, Johnathan Williams <jwilliams@accelerated.org>, "lbrianza@kippla.org" <lbrianza@kippla.org>, "ellavan@laalliance.org" <ellavan@laalliance.org>, "agoldring@laleadership.org" <agoldring@laleadership.org>, Carrie Wagner <cwagner@galsla.org>, Zainab Ali <zali@laalliance.org>, "Lopez, Cesar" <clopez@apexacademyhs.info>, Rhonda Deomampo <rdeomampo@wearesynergy.org>, Hrag Hamalian <hhamalian@brightstarschools.org>, Elena Paul <E.Paul@birminghamcharter.com>, "gscotti@polahs.net" <gscotti@polahs.net>, Liza Bercovici <liza@gabri.org>, Annabelle Eliashiv <annabelle.eliashev@greendot.org>, D Katzir <dkatzir@laalliance.org>, "Mark Kleger-Heine" <mkleger-heine@cwcloseangeles.org>, Richard Thomas <rthomas@nhcharteracademy.com>, Elizabeth Saiger <esaiger@ednovate.org>

CC: Manny Aceves <maceves@kippla.org>, Ebony Wheaton <ewheaton@ccsa.org>, =?utf-8?B?

S2VpdGggRGVsbOKAmUFxdWlsYQ==?= <KDellAquila@ccsa.org>

Hi all,

If you haven't already, we would appreciate if you can please take 10 minutes today to complete the attached letters of opposition to two problematic bills making their way through the legislature as we speak. SB 1362 is this year's charter killer bill, and includes language that would fundamentally threaten the continued existence of charter public schools in California: it would allow for politically-motivated charter denials of even high-performing charters.

Please help us fight back today by completing the attached letters and sending them to Keith Dell'Aquila <mailto:kdellaquila@ccsa.org> by 3pm today.

Los Angeles' voice is critical to protect our students, families, and staff.

Thank you,

Cassy

Cassy Horton

Managing Director, Regional Advocacy, Greater Los Angeles

California Charter Schools Association

Cell: 213-926-7763

Email: chorton@ccsa.org <mailto:chorton@ccsa.org>

From: Cassy Horton
Sent: Wednesday, April 11, 2018 12:44 PM
To: Keith Dell'Aquila KDellAquila@ccsa.org; ddonette@cwcloseangeles.org; J Elliot j.elliott@pucschools.org; Oliver Sicat osicat@ednovate.org; bbauer bbauer@ghchs.com; Valerie Braimah vbraimah@citycharterschools.org; emorris@endeavorcollegeprep.org; Irene Sumida isumida@fentoncharter.net; C DeJesus

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<cdejesus@greendot.org>; Ana Ponce <Ana.Ponce@caminonuevo.org>;
<erin.studer@chimeinstitute.org>; pmagee@palihigh.org; P Hudnut
<phudnut@icefps.org>; ykingberg@ypics.org; Vanessa Jackson
<vanessajackson@collegiatecharterhighschool.org>; Marcia Aaron
<maaron@kippla.org>; C Young <cyoung@magnoliapublicschools.org>;
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<rthomas@nhcharteracademy.com>; Elizabeth Saiger <esaiger@ednovate.org>
Cc: Manny Aceves <maceves@kippla.org>; Ebony Wheaton
<ewheaton@ccsa.org>

Subject: RE: <URGENT REQUEST> Letters of Opposition to Harmful
Legislation

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these letters will make a tremendous impact!

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Managing Director, Regional Advocacy, Greater Los Angeles

California Charter Schools Association

Cell: 213-926-7763

Email: chorton@ccsa.org <<mailto:chorton@ccsa.org>>

From: Keith Dell'Aquila
Sent: Wednesday, April 11, 2018 11:51 AM
To: ddonette@wclosangeles.org <<mailto:ddonette@wclosangeles.org>>; J
Elliot <j.elliott@pucschools.org> <<mailto:j.elliott@pucschools.org>>;
Oliver Sicat <osicat@ednovate.org> <<mailto:osicat@ednovate.org>>; bbauer
<bbauer@ghchs.com> <<mailto:bbauer@ghchs.com>>; Valerie Braimah
<vbraimah@citycharterschools.org>
<<mailto:vbraimah@citycharterschools.org>>;
emorris@endeavorcollegeprep.org <<mailto:emorris@endeavorcollegeprep.org>>
; Irene Sumida <isumida@fentoncharter.net>; C DeJesus <cdejesus@greendot.org>
<<mailto:cdejesus@greendot.org>>; Ana Ponce <Ana.Ponce@caminonuevo.org>
<<mailto:Ana.Ponce@caminonuevo.org>>; erin.studer@chimeinstitute.org
<<mailto:erin.studer@chimeinstitute.org>>; pmagee@palihigh.org
<<mailto:pmagee@palihigh.org>>; P Hudnut <phudnut@icefps.org>

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<phudnut@icefps.org>; ykingberg@ypics.org
<ykingberg@ypics.org>; Vanessa Jackson
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Elizabeth Saiger <esaiger@ednovate.org<esaiger@ednovate.org>;
Cc: Manny Aceves <maceves@kippla.org<maceves@kippla.org>;
Cassy Horton <chorton@ccsa.org<chorton@ccsa.org>; Ebony
Wheaton <ewheaton@ccsa.org<ewheaton@ccsa.org>
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Keith Dell'Aquila

Director, Regional Advocacy, Greater Los Angeles

213-864-6310 | kdellaquila@ccsa.org [<mailto:kdellaquila@ccsa.org>](mailto:kdellaquila@ccsa.org)

Subject: Re: Authorizing and Oversight Policy Working Group Discussion

From: Keith DellAquila

Date: 4/24/18, 6:00 PM

To: "agoldring@laleadership.org" <agoldring@laleadership.org>, "Christopher Copolillo" <ccopolillo@ccsa.org>, Emilio Pack <epack@stem-prep.org>, P Hudnut <phudnut@icefps.org>, "ykingberg@ypics.org" <ykingberg@ypics.org>, "Mark Kleger-Heine" <mkleger-heine@cwclosangeles.org>, "Lopez, Cesar" <clopez@apexacademyhs.info>, Jennie Shin <jshin@ccsa.org>, D Katzir <dkatzir@laalliance.org>, Ana Ponce <aponce@caminonuevo.org>, Zainab Ali <zali@laalliance.org>, "ellavan@laalliance.org" <ellavan@laalliance.org>, Annabelle Eliashiv <annabelle.eliashev@greendot.org>, Vanessa Jackson <vanessajackson@collegiatecharterhighschool.org>, Elena Paul <e.paul@birminghamcharter.com>, Jason Rudolph <jrudolph@ccsa.org>, "emorris@endeavorcollegeprep.org" <emorris@endeavorcollegeprep.org>, "Carrie Wagner" <cwagner@galsla.org>, Marcia Aaron <maaron@kippla.org>, C DeJesus <cdejesus@greendot.org>, Ana Ponce <ana.ponce@caminonuevo.org>, "Elizabeth Saiger" <esaiger@ednovate.org>, Johnathan Williams <jwilliams@accelerated.org>, Oliver Sicat <osicat@ednovate.org>, "gscott@polahs.net" <gscott@polahs.net>, Rhonda Deomampo <rdeomampo@wearesynergy.org>, Cassy Horton <chorton@ccsa.org>, Liza Bercovici <liza@gabri.org>, "lbrianza@kippla.org" <lbrianza@kippla.org>, Hrag Hamalian <hhamalian@brightstarschools.org>, Richard Thomas <rthomas@nhcharteracademy.com>

Good evening,

Thank you for your commitment to our ongoing efforts to move our local policy initiatives forward. Due to timing and policy implications related to the LAUSD Superintendent search, we have determined that it is not the best use of your time for us to proceed with a meeting tomorrow. As a result, we are canceling tomorrow's Authorizing and Oversight Working Group meeting. We truly appreciate your efforts to accommodate this meeting.

We will be reaching out early next week regarding next steps on this work as more information related to the Superintendent search is made clear.

In the meantime, we sincerely appreciate the efforts you are making on multiple fronts to protect high-quality public school options for all students.

If you haven't connected with our team about the June 5 primary and non-partisan ways to promote civic engagement across your school community, we are asking you to do so this week. We would be happy to use the time originally scheduled for tomorrow's meeting to talk with you to that end.

Thanks so much! If you have any questions please let us know.

Keith Dell'Aquila
Director, Regional Advocacy
213-864-6310

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Subject: Canceled: Authorizing and Oversight Policy Working Group Discussion

From: Keith DellAquila

Date: 4/25/18, 7:46 AM

To: Cassy Horton <chorton@ccsa.org>, Johnathan Williams <jwilliams@accelerated.org>, "lbrianza@kippla.org" <lbrianza@kippla.org>, Emilio Pack <epack@stem-prep.org>, "ellavan@laalliance.org" <ellavan@laalliance.org>, "agoldring@laleadership.org" <agoldring@laleadership.org>, Carrie Wagner <cwagner@galsla.org>, "emorris@endeavorcollegeprep.org" <emorris@endeavorcollegeprep.org>, "ykingberg@ypics.org" <ykingberg@ypics.org>, P Hudnut <phudnut@icefps.org>, Zainab Ali <zali@laalliance.org>, "Lopez, Cesar" <lopez@apexacademyhs.info>, Rhonda Deomampo <rdeomampo@wearesynergy.org>, Hrag Hamalian <hhamalian@brightstarschools.org>, Ana Ponce <aponce@caminonuevo.org>, "Elena Paul" <E.Paul@birminghamcharter.com>, "gscotti@polahs.net" <gscotti@polahs.net>, Vanessa Jackson <vanessajackson@collegiatecharterhighschool.org>, Liza Bercovici <liza@gabri.org>, Annabelle Eliashiv <annabelle.eliashev@greendot.org>, Jennie Shin <jshin@ccsa.org>, D Katzir <dkatzir@laalliance.org>, Marcia Aaron <maaron@kippla.org>, C DeJesus <cdejesus@greendot.org>, Mark Kleger-Heine <mkleger-heine@cwclosangeles.org>, Oliver Sicat <osicat@ednovate.org>, "Ana Ponce" <Ana.Ponce@CaminoNuevo.org>, Richard Thomas <rthomas@nhcharteracademy.com>, Elizabeth Saiger <esaiger@ednovate.org>

CC: Christopher Copolillo <ccopolillo@ccsa.org>, Jason Rudolph <jrudolph@ccsa.org>

With the possibility that the Board will select LAUSD's next superintendent as soon as Friday, it's critical that we maintain our momentum and move forward on the critical policy change opportunities before us. Thus, we're asking you reply by 2pm Friday with your preferred date for an in-person conversation with the Working Group next week: Wednesday, 4/25: 2:30-4:00pm

We will circulate a formal agenda and any relevant materials in advance of the discussion.

Subject: <Feedback Requested by May 29> - 2018 Oversight Survey

From: Keith DellAquila

Date: 5/22/18, 2:38 PM

To: Johnathan Williams <jwilliams@accelerated.org>, "lbrianza@kippla.org" <lbrianza@kippla.org>, Emilio Pack <epack@stem-prep.org>, "ellavan@laalliance.org" <ellavan@laalliance.org>, "agoldring@laleadership.org" <agoldring@laleadership.org>, Carrie Wagner <cwagner@galsla.org>, "emorris@endeavorcollegeprep.org" <emorris@endeavorcollegeprep.org>, "ykingberg@ypics.org" <ykingberg@ypics.org>, P Hudnut <phudnut@icefps.org>, Zainab Ali <zali@laalliance.org>, "Lopez, Cesar" <clopez@apexacademyhs.info>, "Rhonda Deomampo" <rdeomampo@wearesynergy.org>, Hrag Hamalian <hhamalian@brightstarschools.org>, Ana Ponce <aponce@caminonuevo.org>, "Elena Paul" <E.Paul@birminghamcharter.com>, "gscott@polahs.net" <gscott@polahs.net>, Vanessa Jackson <vanessajackson@collegiatecharterhighschool.org>, Liza Bercovici <liza@gabri.org>, Annabelle Eliashiv <annabelle.eliashiv@greendot.org>, "D Katzir" <dkatzir@laalliance.org>, Marcia Aaron <maaron@kippla.org>, C DeJesus <cdejesus@greendot.org>, Mark Kleger-Heine <mkleger-heine@cwcloseangeles.org>, Oliver Sicat <osicat@ednovate.org>, Ana Ponce <Ana.Ponce@CaminoNuevo.org>, Richard Thomas <rthomas@nhcharteracademy.com>, Elizabeth Saiger <esaiger@ednovate.org>, **CC:** Cassy Horton <chorton@ccsa.org>, Jennie Shin <jshin@ccsa.org>, "Jason Rudolph" <jrudolph@ccsa.org>, Christopher Copolillo <ccopolillo@ccsa.org>

Dear Oversight Policy Working Group,

Earlier this Spring, the Oversight Policy Working group and the Los Angeles Advocacy Council directed CCSA to revive and refine our Authorization and Oversight Survey, with a streamlined focus on the oversight experience for this year. Since then, we have added to this work the members of the Applicable Policies Working Group in hopes of continuing progress in improving District policy and practice. This email is to invite your optional feedback on the Confidential Draft 2018 Oversight Survey by next Tuesday, May 29.

If you have capacity, please:

1. Review the Confidential Draft 2018 Oversight Survey Questions (linked)
<https://calcharters.box.com/s/svnnnogpg4axo0xq1qfq0jku6it832488> , keeping in mind the Question to Consider and Changes to the Survey (see below) as you formulate your thoughts.
2. Share your feedback by:
 - a. Replying to Keith with your thoughts by 12pm Tuesday, May 29; and/or
 - b. Joining an optional call of this group at 3pm Tuesday, May 29 (invite forthcoming).

This version is a draft, so we ask you to keep it confidential. Details, directions, and more context are below. Please reach out with questions or feedback.

Last year's survey

<https://calcharters.box.com/s/e7hopoe639x5eszis62mplmang65ovwq> was critical in shaping our collective advocacy this year: it provided quantitative data and community-wide experiences <https://calcharters.box.com/s/glzi60v26n72owczq9wbcdfcwyydugz6> that were invaluable in educating the board members on some of our critical issues; focused our collective advocacy on the most impactful changes to policy and practice; and gave legitimacy to the LAAC and Applicable Policy groups when discussing these issues with District staff and Board members. When we have data representing the entire community, we are able to focus our efforts on student-centered policy changes that benefit the most schools.

Questions To Consider for Reviewing the Confidential Draft Survey

1. Do the proposed changes focus the survey on the areas of oversight most important to address and where we may have the opportunity to make changes?
2. Do we have the right questions? Are there specific questions or

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topics we should add or eliminate without substantially increasing the length or widening the scope of the survey? (For example: the identification and sharing of promising practices as part of oversight)
3. Are there open-ended questions might we consider adding to the survey?

Overview of Proposed Changes to the Survey (Based on previous PWG feedback)

1. Focus the survey only on oversight practices: last year's survey covered other important topics that are being addressed through other avenues (like charter renewal) or are lower-priority in the next few months (like policies on material revisions).
2. Add questions about the four specific oversight domains assessed in the Annual Performance-Based Oversight Visit Report in response to reports that organizations are feeling major shifts or pain points in different areas of oversight.
3. Focus on trends in District practice/implementation, rather than on overall assessments of Board policy, because we know that many of our pain points are matters of implementation rather than policy and policy is unchanged from last year.
4. Keep question content consistent with last year's survey to the extent possible so we can measure responses between years but tweak the wording to more accurately measure trends in practice during this school year.
5. Eliminate the ability to complete the survey anonymously because: a) we removed many of the more sensitive questions on other topics, lowering the need for anonymity; b) it keeps the survey shorter by eliminating several questions about the school organization; c) it ensures CCSA can ensure continued representative sampling and provide targeted support to organizations that raise questions or concerns in the survey. Last year 15% of schools chose to respond anonymously. We should emphasize more clearly that CCSA will keep the survey results anonymized, with no individual school responses ever shared.

Reminder: Background on the Oversight Survey

Last year, in order to better refine the charter community's advocacy priorities, the Oversight Policy Working Group developed a 61-question survey that measured the LA charter community's assessment of current LAUSD Authorization and Oversight policies and practices, with a particular emphasis on the following topics: Alignment with NACSA best practices, the new petition process, the renewal process, annual oversight, material revisions, and notices to cure. We focused the survey on identifying strengths and challenges in policy itself and in the practice of implementing policy.

The survey was developed over several months of focus groups with the Policy Working Group, the LAAC, other charter school leaders (and through a UCLA doctoral course in survey research methodology). The CSD was given a chance to review the survey and add questions but declined to do so. The final survey results immediately informed the LAAC North Star priorities, our work with the newly-elected LAUSD Board, and CCSA's broader statewide and legislative work.

Even with a change in the Board presidency and two changes in the superintendent, we've kept moving the work forward: we secured major changes to DRL through fall negotiations and the Applicable Policies working group, and started to tackle the need to more clearly define charter school renewal criteria. (For example, our survey revealed that only a third of respondents felt that the recommendations for renewal or non-renewal to the CSD were consistent with state law, District policy and consistent across schools.)

In the Spring of this year, this group recommended (and the LAAC voted in agreement) that we issue a survey again, making changes to focus only on oversight and adding questions to measure where oversight practice has improved and where practices has become more concerning.

Keith Dell'Aquila

Director, Regional Advocacy, Greater Los Angeles

213-864-6310 | kdellaquila@ccsa.org <<mailto:kdellaquila@ccsa.org>>

Your vote matters! The 2018 statewide primary election will have a big impact on the future of California's public schools and students. Help ensure we elect candidates who support charter public schools and will put kids first. The deadline to register to vote is May 21. Be sure to register to vote <https://registertovote.ca.gov/> and make your voice heard on June 5!

Subject: <For Feedback/Approval by 7pm Today> LAAC Collective Renewal Criteria Letter

From: Cassy Horton

Date: 9/19/18, 10:09 AM

To: Ana Ponce <aponce@caminonuevo.org>, C DeJesus <cdejesus@greendot.org>, Emilio Pack <epack@stem-prep.org>, Marcia Aaron <maaron@kippla.org>, bbauer <bbauer@ghchs.com>, "erin.studer@chimeinstitute.org" <erin.studer@chimeinstitute.org>, Valerie Braimah <vbraimah@citycharterschools.org>, Oliver Sicat <osicat@ednovate.org>, "Pamela Magee" <pmagee@palihigh.org>, P Hudnut <phudnut@icefps.org>, "emorris@endeavorcollegeprep.org" <emorris@endeavorcollegeprep.org>, "Vanessa Jackson" <vanessajackson@collegiatecharterhighschool.org>, Yvette Kingberg <Ykingberg@yahoo.com>, Mark Kleger-Heine <mkleger-heine@cwcalifornia.org>, "cwagner@galschoolsla.org" <cwagner@galschoolsla.org>, "agoldring@laleadership.org" <agoldring@laleadership.org>, "nbarriga@resoluteacademy.org" <nbarriga@resoluteacademy.org>, "Johnathan Williams" <jwilliams@accelerated.org>, NHCA <rthomas@nhcharteracademy.com>
CC: =?Windows-1252?Q?Keith_Dell=92Aquila?= <KDellAquila@ccsa.org>

Hi everyone,

Thanks for your time and engagement at yesterday's LAAC meeting. We are excited to move our LAAC-approved policy priorities forward this year, including updated local charter renewal criteria and a student-focused performance framework.

Response/Approval Requested by 7pm Today

Since we met yesterday, our team incorporated the feedback you provided about our collective renewal letter and made corresponding updates which we have initially vetted by our chair and co-chair. We request that each of you review the attached updated collective letter and respond directly via email to Keith (cc'd here) and me with feedback or suggested edits by end of day today. We will work to synthesize overall feedback and nail down a final draft with Emilio and Cristina today.

Our goal is to secure the support of the entire LAAC before we distribute this letter to the broader charter community tomorrow. We hope to collect signatures of 75% of the charter community by Monday, September 24 to send to the Board on Tuesday prior to the Board Meeting on September 25.

We are happy to jump on the phone today with folks if that is easier than providing written feedback.

Cassy

Cassy Horton
Managing Director, Regional Advocacy, Greater Los Angeles
California Charter Schools Association
Cell: 213-926-7763
Email: chorton@ccsa.org <<mailto:chorton@ccsa.org>>
Website: www.ccsa.org <<http://www.ccsa.org>>

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Subject: FW: <CONFIDENTIAL: Sign On by Mon. 9/24> Collective Letter re Charter Renewal Criteria

From: Cassy Horton

Date: 9/20/18, 7:39 PM

To: Ana Ponce <aponce@caminonuevo.org>, C DeJesus <cdejesus@greendot.org>, Emilio Pack <epack@stem-prep.org>, Marcia Aaron <maaron@kippla.org>, bbauer <bbauer@ghchs.com>, "erin.studer@chimeinstitute.org" <erin.studer@chimeinstitute.org>, Valerie Braimah <vbraimah@citycharterschools.org>, Oliver Sicat <osicat@ednovate.org>, "Pamela Magee" <pmagee@palihigh.org>, P Hudnut <phudnut@icefps.org>, "emorris@endeavorcollegeprep.org" <emorris@endeavorcollegeprep.org>, "Vanessa Jackson" <vanessajackson@collegiatecharterhighschool.org>, Yvette Kingberg <Ykingberg@yahoo.com>, Mark Kleger-Heine <mkleger-heine@cwcalifornia.org>, "cwagner@galschoolsla.org" <cwagner@galschoolsla.org>, "agoldring@laleadership.org" <agoldring@laleadership.org>, "nbarriga@resoluteacademy.org" <nbarriga@resoluteacademy.org>, "Johnathan Williams" <jwilliams@accelerated.org>, NHCA <rthomas@nhcharteracademy.com>
CC: Chris Copolillo <ccopolillo@ccsa.org>, =?Windows-1252?Q?Keith_Dell=92Aquila?= <KDellAquila@ccsa.org>, Jason Rudolph <jrudolph@ccsa.org>

Hello LAAC Members,

Thanks to everyone who provided feedback regarding the LAAC-supported collective renewal criteria letter. We worked to incorporate your comments into the final attached document. We plan to include each of your organizations in support, so there is no need to reach out to sign back on.

We will be working hard before Tuesday's meeting to secure support of the broader community. If you have any questions or concerns, please let us know.

Thanks,

Cassy

Cassy Horton

Managing Director, Regional Advocacy, Greater Los Angeles

California Charter Schools Association

Cell: 213-926-7763

Email: chorton@ccsa.org <<mailto:chorton@ccsa.org>>

Registration for the 26th Annual California Charter Schools Conference is open! Register today and save!

<https://charterconference.org/2019/registration/> The conference will be held March 11-14, 2019 at the Sacramento Convention Center. We look forward to seeing you there!

From: Cassy Horton
Sent: Thursday, September 20, 2018 7:36 PM
Cc: Keith Dell'Aquila (KDellAquila@ccsa.org) <KDellAquila@ccsa.org>
Subject: <CONFIDENTIAL: Sign On by Mon. 9/24> Collective Letter re Charter Renewal Criteria
Importance: High

Los Angeles Charter Leaders,

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We ask that you please do not forward or otherwise share this email, attachment, or strategy, which we talked through on today's LA member call.

As a reminder, we are hosting another member call on this same topic tomorrow afternoon at 5:30pm if you could not join us today. Please email Chris Copolillo (ccopolillo@ccsa.org <mailto:ccopolillo@ccsa.org>) to RSVP.

Sign the Renewal Collective Letter by Monday, September 24 at 10am

I am writing to ask you to sign on to the attached collective letter from the LA charter community requesting the opportunity to collaborate with the District to update charter renewal criteria so that decisions about the future of your schools are assessed consistently, and transparently, with a focus on student academic outcomes. To sign on, please email Keith Dell'Aquila (kdellaquila@ccsa.org <mailto:kdellaquila@ccsa.org>) by 10am on Monday, September 24.

Background

Next Tuesday, September 25 the Board will take action on our first cohort of renewing petitions for the year. Over the coming months, nearly 50 schools serving more than 25,000 students will have their fate decided by this board without a clear, consistent, transparent process for assessing student performance within the context of renewal.

Updating charter renewal criteria is one of our charter-leader approved local policy priorities for the year. This priority is the result of inconsistent renewal processes, recommendations and benchmarks that have progressed since the transition to SBAC. This letter was drafted with and is already signed by the 19 members of the Los Angeles Advocacy Council (LAAC), the steering committee LAUSD charter leaders representing different school types, geographic, and policy focuses guide our policy work in Los Angeles.

With the District simultaneously developing a School Performance Framework meant to assess all schools, including charter schools, it's critical that the LAUSD Board, leadership, and staff work with the charter community to ensure that this year's renewals are assessed consistently and that we build a more transparent process in time for next year's renewals. The time to raise this issue is now so that we can partner with L.A. Unified towards our shared goals of transparency, accountability, and increased student learning.

Again, we ask that you please review the attached collective letter and email Keith Dell'Aquila (kdellaquila@ccsa.org <mailto:kdellaquila@ccsa.org>), cc'd here, directly to agree to sign on by 10am on Monday, September 24. We plan to send to the Board prior to the first renewal votes Tuesday, September 25.

If you have questions, feedback or comments, please email us directly to discuss.

Thank you for your support,

Cassy

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Cassy Horton
Managing Director, Regional Advocacy, Greater Los Angeles
California Charter Schools Association
Cell: 213-926-7763
Email: chorton@ccsa.org <<mailto:chorton@ccsa.org>>
Website: www.ccsa.org <<http://www.ccsa.org>>

image001.jpg



Subject: [Revised] Los Angeles Advocacy Council: December Meeting

From: Jason Rudolph

Date: 12/6/18, 7:15 AM

To: Emilio Pack <epack@stem-prep.org>, C DeJesus <cdejesus@greendot.org>, Marcia Aaron <maaron@kippla.org>, Brian Bauer 2 <senorbbauer@aol.com>, "P Hudnut" <phudnut@icefps.org>, Johnathan Williams <jwilliams@accelerated.org>, Ana Ponce <aponce@caminonuevo.org>, "emorris@endeavorcollegeprep.org" <emorris@endeavorcollegeprep.org>, "pmagee@palihigh.org" <pmagee@palihigh.org>, Oliver Sicat <osicat@ednovate.org>, Vanessa Jackson <vanessajackson@collegiatecharterhighschool.org>, Valerie Braimah <vbraimah@citycharterschools.org>, Richard Thomas <rthomas@nhcharteracademy.com>, "erin.studer@chimeinstitute.org" <erin.studer@chimeinstitute.org>, Yvette King-Berg <ykingberg@ypics.org>, "nbarriga@resoluteacademy.org" <nbarriga@resoluteacademy.org>, "agoldring@laleadership.org" <agoldring@laleadership.org>, "cwagner@galsla.org" <cwagner@galsla.org>, "mkleger-heine@cwclosangeles.org" <mkleger-heine@cwclosangeles.org>, Cassy Horton <chorton@ccsa.org>, =?Windows-1252?Q?Keith_Dell=92Aquila?= <KDellAquila@ccsa.org>, "Chris Copolillo" <ccopolillo@ccsa.org>

LAAC December Meeting – 2:00pm-4:00pm (Forthcoming Calendar Invitation)

The calendar invite you already have for this regularly scheduled meeting lists CCSA's Los Angeles office as the meeting location. However, given the luncheon that many of you might already attend, we will now hold the LAAC meeting at STEM Prep's Math and Science College Preparatory School located at 3200 W. Adams Boulevard, Los Angeles, California 90018. CCSA will cancel the prior invite you have (sent by our former colleague, Jennie Shin) and send you a new, updated calendar invite with the correct meeting location.

If you have any questions, please do not hesitate to reach out to me directly!

Thanks,

Jason Rudolph

(213) 248-1398

RISKIN0021

Subject: [Revised] Los Angeles Advocacy Council: December Meeting

From: Jason Rudolph

Date: 12/11/18, 9:21 PM

To: Emilio Pack <epack@stem-prep.org>, C DeJesus <cdejesus@greendot.org>, Marcia Aaron <maaron@kippla.org>, Brian Bauer 2 <senorbbauer@aol.com>, "P Hudnut" <phudnut@icefps.org>, Johnathan Williams <jwilliams@accelerated.org>, Ana Ponce <aponce@caminonuevo.org>, "emorris@endeavorcollegeprep.org" <emorris@endeavorcollegeprep.org>, "pmagee@palihigh.org" <pmagee@palihigh.org>, Oliver Sicat <osicat@ednovate.org>, Vanessa Jackson <vanessajackson@collegiatecharterhighschool.org>, Valerie Braimah <vbraimah@citycharterschools.org>, Richard Thomas <rthomas@nhcharteracademy.com>, "erin.studer@chimeinstitute.org" <erin.studer@chimeinstitute.org>, Yvette King-Berg <ykingberg@ypics.org>, "nbarriga@resoluteacademy.org" <nbarriga@resoluteacademy.org>, "agoldring@laleadership.org" <agoldring@laleadership.org>, "cwagner@galsla.org" <cwagner@galsla.org>, "mkleger-heine@cwclosangeles.org" <mkleger-heine@cwclosangeles.org>, Cassy Horton <chorton@ccsa.org>, =?Windows-1252?Q?Keith_Dell=92Aquila?= <KDellAquila@ccsa.org>, "Chris Copolillo" <ccopolillo@ccsa.org>, Jacob Regalado <jregalado@ccsa.org>, "Alix Fraser" <afraser@ccsa.org>

CC: Ana Ponce <Ana.Ponce@CaminoNuevo.org>

Revised LAAC December Meeting – 2:45pm-4:00pm

We will now hold the LAAC meeting at Holman United Methodist Church located at located at 3320 W. Adams Boulevard, Los Angeles, California 90018.

If you have any questions, please do not hesitate to reach out to me directly!

Thanks,

Jason Rudolph

(213) 248-1398

RISKIN0022

Subject: <Urgent LAAC Call> Alignment on Strategy re: LAUSD Proposed Charter Moratorium Resolution

From: Jason Rudolph

Date: 1/24/19, 12:36 PM

To: Emilio Pack <epack@stem-prep.org>, C DeJesus <cdejesus@greendot.org>, Marcia Aaron <maaron@kippla.org>, Johnathan Williams <jwilliams@accelerated.org>, P Hudnut <phudnut@icefps.org>, Yvette King-Berg <ykingberg@ypics.org>, "erin.studer@chimeinstitute.org" <erin.studer@chimeinstitute.org>, Edward Morris <emorris@endeavorcollegeprep.org>, "pmagee@palihigh.org" <pmagee@palihigh.org>, Oliver Sicat <osicat@ednovate.org>, Valerie Braimah <vbraimah@citycharterschools.org>, Vanessa Jackson <vanessajackson@collegiatecharterhighschool.org>, Mark Kleger-Heine <mkleger-heine@cwlosangeles.org>, Ana Ponce <Ana.Ponce@CaminoNuevo.org>, Carrie Wagner <cwagner@galsla.org>, Natasha Barriga <nbarriga@resoluteacademy.org>, Arina Goldring <agoldring@laleadership.org>, Richard Thomas <rthomas@nhcharteracademy.com>, bbauer <bbauer@ghchs.com>, Cassy Horton <chorton@ccsa.org>, =?Windows-1252?Q?Keith_Dell=92Aquila?= <KDellAquila@ccsa.org>, Chris Copolillo <ccopolillo@ccsa.org>, Luis Figueiroa <lfigueroa@ccsa.org>

Subject: RE: <Urgent LAAC Call> Alignment on Strategy re: LAUSD Proposed Charter Moratorium Resolution
From: Cristina de Jesus
Date: 1/25/19, 8:42 AM
To: Emilio Pack <epack@stem-prep.org>, Carrie Wagner <cwagner@galsla.org>
CC: Jason Rudolph <jrudolph@ccsa.org>, Marcia Aaron <maaron@kippla.org>, Johnathan Williams <jwilliams@accelerated.org>, P Hudnut <phudnut@icefps.org>, Yvette King-Berg <ykingberg@ypics.org>, "erin.studer@chimeinstitute.org" <erin.studer@chimeinstitute.org>, Edward Morris <emorris@endeavorcollegeprep.org>, "pmagee@palihigh.org" <pmagee@palihigh.org>, Oliver Sicat <osicat@ednovate.org>, Valerie Braimah <vbraimah@citycharterschools.org>, Vanessa Jackson <vanessajackson@collegiatecharterhighschool.org>, Mark Kleger-Heine <mkleger-heine@cwlosangeles.org>, Ana Ponce <Ana.Ponce@caminonuevo.org>, Natasha Barriga <nbarriga@resoluteacademy.org>, Arina Goldring <agoldring@laleadership.org>, Richard Thomas <rthomas@nhcharteracademy.com>, bbauer <bbauer@ghchs.com>, Cassy Horton <chorton@ccsa.org>, =?utf-8?B?S2VpdGggRGVsbOKAmUFxdWlsYQ==?= <KDellAquila@ccsa.org>, Chris Copolillo <ccopolillo@ccsa.org>, Luis Figueroa <lfigueroa@ccsa.org>

The slogan idea is great. Key messages are important. Cassy, can the CCSA team take a stab at the slogans?

From: Emilio Pack <epack@stem-prep.org>
Sent: Friday, January 25, 2019 8:41 AM
To: Carrie Wagner <cwagner@galsla.org>
Cc: Jason Rudolph <jrudolph@ccsa.org>; Cristina de Jesus <cdejesus@greendot.org>; Marcia Aaron <maaron@kippla.org>; Johnathan Williams <jwilliams@accelerated.org>; P Hudnut <phudnut@icefps.org>; Yvette King-Berg <ykingberg@ypics.org>; erin.studer@chimeinstitute.org;; Edward Morris <emorris@endeavorcollegeprep.org>; pmagee@palihigh.org;; Oliver Sicat <osicat@ednovate.org>; Valerie Braimah <vbraimah@citycharterschools.org>; Vanessa Jackson <vanessajackson@collegiatecharterhighschool.org>; Mark Kleger-Heine <mkleger-heine@cwlosangeles.org>; Ana Ponce <Ana.Ponce@caminonuevo.org>; Natasha Barriga <nbarriga@resoluteacademy.org>; Arina Goldring <agoldring@laleadership.org>; Richard Thomas <rthomas@nhcharteracademy.com>; bbauer <bbauer@ghchs.com>; Cassy Horton <chorton@ccsa.org>; Keith Dell'Aquila <KDellAquila@ccsa.org>; Chris Copolillo <ccopolillo@ccsa.org>; Luis Figueroa <lfigueroa@ccsa.org>
Subject: Re: <Urgent LAAC Call> Alignment on Strategy re: LAUSD Proposed Charter Moratorium Resolution

Thank you for this!

On Jan 25, 2019, at 6:43 AM, Carrie Wagner <cwagner@galsla.org> <mailto:cwagner@galsla.org> wrote:

Dear LAAC,

Thanks for the great call yesterday. I woke up this morning realizing that our charter school vendors need to be out there with us on Tuesday. I am sure Anita Landecker from ExED can get a bus load of staff and can also passionately share with her clients the importance of being present on Tuesday at the Rally. I will call her this morning.

We need Edtec, CSMC, CharterSAFE, Scoot out there too. I am going to call our food service provider this morning too. Anyone that works with our movement. The TIME IS NOW! We need EVERYBODY!

I also see that TFA is going to need our help with that crazy bill that was submitted trying to prevent TFA in low income traditional and charter schools. I am happy to help them but we need their help on Tuesday.

My people will have GALS shirts on but we do need tshirts for people that are joining us and or a color that everyone can wear. We also should consider 5 key slogans.

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Thanks,

Carrie Wagner
Executive Director
GALS LA
310-593-3620
www.galsla.org <<http://www.galsla.org>>

On Thu, Jan 24, 2019 at 12:36 PM Jason Rudolph
<jrudolph@ccsa.org <<mailto:jrudolph@ccsa.org>>> wrote:

Subject: RE: <Urgent LAAC Call> Alignment on Strategy re: LAUSD Proposed Charter Moratorium Resolution
From: Cassy Horton
Date: 1/25/19, 8:50 AM
To: C DeJesus <cdejesus@greendot.org>, Emilio Pack <epack@stem-prep.org>, Carrie Wagner <cwagner@galsla.org>
CC: Jason Rudolph <jrudolph@ccsa.org>, Marcia Aaron <maaron@kippla.org>, Johnathan Williams <jwilliams@accelerated.org>, P Hudnut <phudnut@icefps.org>, Yvette King-Berg <ykingberg@ypics.org>, "erin.studer@chimeinstitute.org" <erin.studer@chimeinstitute.org>, "Edward Morris" <emorris@endeavorcollegeprep.org>, "pmagee@palihigh.org" <pmagee@palihigh.org>, Oliver Sicat <osicat@ednovate.org>, Valerie Braimah <vbraimah@citycharterschools.org>, Vanessa Jackson <vanessajackson@collegiatecharterhighschool.org>, Mark Kleger-Heine <mkleger-heine@cwclosangeles.org>, Ana Ponce <Ana.Ponce@caminonuevo.org>, Natasha Barriga <nbarriga@resoluteacademy.org>, Arina Goldring <agoldring@laleadership.org>, Richard Thomas <rthomas@nhcharteracademy.com>, bbauer <bbauer@ghchs.com>, =?utf-8?B?S2VpdGggRGVsbOKAmUFxdWlsYQ==?= <KDellAquila@ccsa.org>, Chris Copolillo <ccopolillo@ccsa.org>, Luis Figueroa <lfigueroa@ccsa.org>

Already on it! See the attached flyer. Here are the general slogans:

Ask of Electeds:

* Put KIDS over politics: Vote NO on the Charter Ban!

Main Messages:

- * Families deserve a choice!
- * Let us learn! / Let our kids learn!
- * Charter public schools work for kids!
- * Put KIDS over politics!
- * No charter ban!

#KidsNotPolitics

#LetUsLearn

#NOCharterBan

For signs, etc. I also ask you to highlight accomplishments or unique things about your school.

Cassy Horton

Managing Director, Regional Advocacy, Greater Los Angeles

California Charter Schools Association

Cell: 213-926-7763

Email: chorton@ccsa.org <<mailto:chorton@ccsa.org>>

Registration for the 26th Annual California Charter Schools Conference is open! Register today and save!

<https://charterconference.org/2019/registration/> The conference will be held March 11-14, 2019 at the Sacramento Convention Center. We look forward to seeing you there!

To: Emilio Pack <epack@stem-prep.org>; Carrie Wagner <cwagner@galsla.org>
Cc: Jason Rudolph <jrudolph@ccsa.org>; Marcia Aaron <maaron@kippla.org>; Johnathan Williams <jwilliams@accelerated.org>; P Hudnut <phudnut@icefps.org>; Yvette King-Berg <ykingberg@ypics.org>; erin.studer@chimeinstitute.org; Edward Morris <emorris@endeavorcollegeprep.org>; pmagee@palihigh.org; Oliver Sicat <osicat@ednovate.org>; Valerie Braimah <vbraimah@citycharterschools.org>; Vanessa Jackson <vanessajackson@collegiatecharterhighschool.org>; Mark Kleger-Heine <mkleger-heine@cwclosangeles.org>; Ana Ponce <Ana.Ponce@caminonuevo.org>; Natasha Barriga <nbarriga@resoluteacademy.org>; Arina Goldring <agoldring@laleadership.org>; Richard Thomas <rthomas@nhcharteracademy.com>; bbauer <bbauer@ghchs.com>; Cassy Horton <chorton@ccsa.org>; Keith Dell'Aquila <KDellAquila@ccsa.org>; Chris Copolillo <ccopolillo@ccsa.org>; Luis Figueroa <lfigueroa@ccsa.org>
Subject: RE: <Urgent LAAC Call> Alignment on Strategy re: LAUSD
Proposed Charter Moratorium Resolution

The slogan idea is great. Key messages are important. Cassy, can the CCSA team take a stab at the slogans?

From: Emilio Pack <epack@stem-prep.org <mailto:epack@stem-prep.org>>
Sent: Friday, January 25, 2019 8:41 AM
To: Carrie Wagner <cwagner@galsla.org <mailto:cwagner@galsla.org>>
Cc: Jason Rudolph <jrudolph@ccsa.org <mailto:jrudolph@ccsa.org>>;
Cristina de Jesus <cdejesus@greendot.org <mailto:cdejesus@greendot.org>>
; Marcia Aaron <maaron@kippla.org <mailto:maaron@kippla.org>>;
Johnathan Williams <jwilliams@accelerated.org>; P Hudnut <phudnut@icefps.org>; Yvette King-Berg <ykingberg@ypics.org>; erin.studer@chimeinstitute.org <erin.studer@chimeinstitute.org>; Edward Morris <emorris@endeavorcollegeprep.org>; pmagee@palihigh.org <pmagee@palihigh.org>; Oliver Sicat <osicat@ednovate.org>; Valerie Braimah <vbraimah@citycharterschools.org>; Vanessa Jackson <vanessajackson@collegiatecharterhighschool.org>; Mark Kleger-Heine <mkleger-heine@cwclosangeles.org>; Ana Ponce <Ana.Ponce@caminonuevo.org>; Natasha Barriga <nbarriga@resoluteacademy.org>; Arina Goldring <agoldring@laleadership.org>; Richard Thomas <rthomas@nhcharteracademy.com>; bbauer <bbauer@ghchs.com>; Cassy Horton <chorton@ccsa.org>; Keith Dell'Aquila <KDellAquila@ccsa.org>; Chris Copolillo <ccopolillo@ccsa.org>; Luis Figueroa <lfigueroa@ccsa.org>;
Subject: Re: <Urgent LAAC Call> Alignment on Strategy re: LAUSD
Proposed Charter Moratorium Resolution

Thank you for this!

On Jan 25, 2019, at 6:43 AM, Carrie Wagner <cwagner@galsla.org> <mailto:cwagner@galsla.org> wrote:

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RISKIN0027

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My people will have GALS shirts on but we do need tshirts for people that are joining us and or a color that everyone can wear. We also should consider 5 key slogans.

Thanks,

Carrie Wagner
Executive Director
GALS LA
310-593-3620

www.galsla.org <<http://www.galsla.org>>

On Thu, Jan 24, 2019 at 12:36 PM Jason Rudolph <jrudolph@ccsa.org <<mailto:jrudolph@ccsa.org>>> wrote:

image001.jpg

RISKIN0028

Subject: Re: <Urgent LAAC Call> Alignment on Strategy re: LAUSD Proposed Charter Moratorium Resolution

From: "agoldring@laleadership.org" <agoldring@laleadership.org>

Date: 1/25/19, 8:52 AM

To: Cristina de Jesus

CC: Emilio Pack <epack@stem-prep.org>, Carrie Wagner <cwagner@galsla.org>, Jason Rudolph <jrudolph@ccsa.org>, Marcia Aaron <maaron@kippla.org>, Johnathan Williams <jwilliams@accelerated.org>, P Hudnut <phudnut@icefps.org>, Yvette King-Berg <ykingberg@ypics.org>, "erin.studer@chimeinstitute.org" <erin.studer@chimeinstitute.org>, Edward Morris <emorris@endeavorcollegeprep.org>, "pmagee@palihigh.org" <pmagee@palihigh.org>, Oliver Sicat <osicat@ednovate.org>, Valerie Braimah <vbraimah@citycharterschools.org>, Vanessa Jackson <vanessajackson@collegiatecharterhighschool.org>, Mark Kleger-Heine <mkleger-heine@cwlosangeles.org>, Ana Ponce <Ana.Ponce@caminonuevo.org>, Natasha Barriga <nbarriga@resoluteacademy.org>, Richard Thomas <rthomas@nhcharteracademy.com>, bbauer <bbauer@ghchs.com>, Cassy Horton <chorton@ccsa.org>, =?utf-8?Q?Keith_Dell=E2=80=99Aquila?= <KDellAquila@ccsa.org>, Chris Copolillo <ccopolillo@ccsa.org>, Luis Figueroa <lfigueroa@ccsa.org>

Thank you, Carrie! Parental Voice and Educational choice should be included in the slogan.

Sent from my iPhone

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From: Emilio Pack <epack@stem-prep.org<<mailto:epack@stem-prep.org>>>
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Cc: Jason Rudolph <jrudolph@ccsa.org<<mailto:jrudolph@ccsa.org>>>
; Cristina de Jesus <cdejesus@greendot.org<<mailto:cdejesus@greendot.org>>>

<<mailto:cdejesus@greendot.org>>; Marcia Aaron <maaron@kippla.org<<mailto:maaron@kippla.org>>; Johnathan Williams <jwilliams@accelerated.org<<mailto:jwilliams@accelerated.org>>; P Hudnut <phudnut@icefps.org<<mailto:phudnut@icefps.org>>; Yvette King-Berg <ykingberg@ypics.org<<mailto:ykingberg@ypics.org>>; erin.studer@chimeinstitute.org <<mailto:erin.studer@chimeinstitute.org>>; Edward Morris <emorris@endeavorcollegeprep.org<<mailto:emorris@endeavorcollegeprep.org>>; pmagee@palihigh.org <<mailto:pmagee@palihigh.org>>; Oliver Sicat <osicat@ednovate.org<<mailto:osicat@ednovate.org>>; Valerie Braimah <vbraimah@citycharterschools.org<<mailto:vbraimah@citycharterschools.org>>; Vanessa Jackson <vanessajackson@collegiatecharterhighschool.org<<mailto:vanessajackson@collegiatecharterhighschool.org>>; Mark Kleger-Heine <mkleger-heine@cwlosangeles.org<<mailto:mkleger-heine@cwlosangeles.org>>; Ana Ponce <Ana.Ponce@caminonuevo.org<<mailto:Ana.Ponce@caminonuevo.org>>; Natasha Barriga <nbarriga@resoluteacademy.org<<mailto:nbarriga@resoluteacademy.org>>; Arina Goldring <agoldring@laleadership.org<<mailto:agoldring@laleadership.org>>; Richard Thomas <rthomas@nhcharteracademy.com<<mailto:rthomas@nhcharteracademy.com>>; bbauer <bbauer@ghchs.com<<mailto:bbauer@ghchs.com>>; Cassy Horton <chorton@ccsa.org<<mailto:chorton@ccsa.org>>; Keith Dell'Aquila <KDellAquila@ccsa.org<<mailto:KDellAquila@ccsa.org>>; Chris Copolillo <ccopolillo@ccsa.org<<mailto:ccopolillo@ccsa.org>>; Luis Figueroa <lfigueroa@ccsa.org<<mailto:lfigueroa@ccsa.org>>>

Subject: Re: <Urgent LAAC Call> Alignment on Strategy re: LAUSD Proposed Charter Moratorium Resolution

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RISKIN0029

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Executive Director

GALS LA

310-593-3620

www.galsla.org

<https://linkprotect.cudasvc.com/url?a=http%3a%2f%2fwww.galsla.org&c=E,1,F01oi0XEFEOnlcoBauk2yMq7oPnjBSP5fNPlErxAxGBkvUdN80ka4LsE9tSBfv_UIafv6GAi9l_-0inZ0DPyJ-zSGVzpLisbSPVnwe1Tjpw,,&typo=1>

On Thu, Jan 24, 2019 at 12:36 PM Jason Rudolph

<jrudolph@ccsa.org <<mailto:jrudolph@ccsa.org>>> wrote:

RISKIN0030

Subject: Fwd: <Urgent LAAC Call> Alignment on Strategy re: LAUSD Proposed Charter Moratorium Resolution
From: Yvette king-berg
Date: 1/25/19, 7:29 PM
To: emorris@endeavorcollegeprep.org, "To: agoldring@laleadership.org" <agoldring@laleadership.org>, "Cc: Ana Ponce" <Ana.Ponce@caminonuevo.org>, Carrie Wagner <cwagner@galsla.org>, Cassy Horton <chorton@ccsa.org>, Chris Copolillo <ccopolillo@ccsa.org>, Cristina de Jesus <cdejesus@greendot.org>, Emilio Pack <epack@stem-prep.org>, Jason Rudolph <jrudolph@ccsa.org>, Johnathan Williams <jwilliams@accelerated.org>, =?UTF-8?Q?Keith_Dell=E2=80=99Aquila?= <KDellAquila@ccsa.org>, Luis Figueroa <lfigueroa@ccsa.org>, Marcia Aaron <maaron@kippla.org>, Mark Kleger-Heine <mkleger-heine@cwcloseangeles.org>, Natasha Barriga <nbarriga@resoluteacademy.org>, Oliver Sicat <osicat@ednovate.org>, P Hudnut <phudnut@icefps.org>, Richard Thomas <rthomas@nhcharteracademy.com>, Valerie Braimah <vbraimah@citycharterschools.org>, Vanessa Jackson <vanessajackson@collegiatecharterhighschool.org>, Yvette King-Berg <ykingberg@ypics.org>, bbauer <bbauer@ghchs.com>, erin.studer@chimeinstitute.org, pmagee@palihigh.org

All,
Great suggestions! I spent the day reaching out to my vendors and inviting them to attend the rally with us. Also, I think it would be a great idea if CCSA could reach out to the greater Charter Community, LA County and anyone from the Kern County south to San Diego County. Several charter leaders from outside of LA asked me today how can they help. I told them to join us in LA on Tuesday. I am wondering if we should just send the word out, if you can join us in LA on Tuesday please do so. I am going to leave that up to Tyler and others, but at least wanted you to know that I think we need to think bigger and broader to get this done in such a short period of time.

In solidarity!

Yvette

----- Forwarded message -----

From: Yvette King-Berg <ykingberg@ypics.org<<mailto:ykingberg@ypics.org>>>
Date: Fri, Jan 25, 2019 at 7:23 PM
Subject: Fwd: <Urgent LAAC Call> Alignment on Strategy re: LAUSD Proposed Charter Moratorium Resolution
To: Yvette King-Berg <ykingberg@gmail.com<<mailto:ykingberg@gmail.com>>

Yvette King-Berg

Executive Director
Youth Policy Institute Charter Schools
9400 Remick Avenue
Pacoima, CA 91331
P (818) 305-2791 <tel:%28818%29%20305-2791>
F (818) 847-7659 <tel:%28818%29%20847-7659>

<http://www.ypics.org>
<https://linkprotect.cudasvc.com/url?a=http%3a%2f%2fwww.ypics.org%2f&c=E1,1Ts3A3zxpqga0mqVZYzqN_ryxIL7PhFKCTeQCmEokgXgDi2_D2sGD79q53ohbtDhYaox0FbqJYFb6JEP4d0FvxhUVRhTC1qoeo8lDpwy_11Eoql3ERkfc8dM3S22&typo=1>
9400 Remick St
Pacoima CA 91331

<https://linkprotect.cudasvc.com/url?a=http%3a%2f%2fmrharvey.ypics.org%2fwp-content%2fuploads%2fsites%2f10%2f2015%2f10%2fYPICS-email-footer.png&c=E1,tHjTuLnXmC0x0pL9qqyl9QHIE9ISF2ETyAyZkEXS8gYucs4500Sn0sUqUeDka7oE0_0WTnGASH719zUPJYqDy2TGs1-PB0eoGSBiMAIjzXu_aQoyhPIFfQ,,&typo=1>

----- Forwarded message -----

From: Edward Morris <emorris@endeavorcollegeprep.org<<mailto:emorris@endeavorcollegeprep.org>>>
Date: Fri, Jan 25, 2019 at 12:30 PM
Subject: Re: <Urgent LAAC Call> Alignment on Strategy re: LAUSD Proposed Charter Moratorium Resolution
To: agoldring@laleadership.org<<mailto:agoldring@laleadership.org>><agoldring@laleadership.org<<mailto:agoldring@laleadership.org>>>

RISKIN0031

Cc: Ana Ponce <Ana.Ponce@caminonuevo.org>
<<mailto:Ana.Ponce@caminonuevo.org>>, Carrie Wagner <cwagner@galsla.org>
<<mailto:cwagner@galsla.org>>, Cassy Horton <chorton@ccsa.org>
<<mailto:chorton@ccsa.org>>, Chris Copolillo <ccopolillo@ccsa.org>
<<mailto:ccopolillo@ccsa.org>>, Cristina de Jesus <cdejesus@greendot.org>
<<mailto:cdejesus@greendot.org>>, Emilio Pack <epack@stem-prep.org>
<<mailto:epack@stem-prep.org>>, Jason Rudolph <jrudolph@ccsa.org>
<<mailto:jrudolph@ccsa.org>>, Johnathan Williams
<jwilliams@accelerated.org> <<mailto:jwilliams@accelerated.org>>, Keith
Dell'Aquila <KDellAquila@ccsa.org> <<mailto:KDellAquila@ccsa.org>>, Luis
Figueroa <lfigueroa@ccsa.org> <<mailto:lfigueroa@ccsa.org>>, Marcia Aaron
<maaron@kippla.org> <<mailto:maaron@kippla.org>>, Mark Kleger-Heine
<mkleger-heine@cwlosangeles.org>
<<mailto:mkleger-heine@cwlosangeles.org>>, Natasha Barriga
<nbarriga@resoluteacademy.org> <<mailto:nbarriga@resoluteacademy.org>>, Oliver Sicat
<osicat@ednovate.org> <<mailto:osicat@ednovate.org>>, P
Hudnut <phudnut@icefps.org> <<mailto:phudnut@icefps.org>>, Richard Thomas
<rthomas@nhcharteracademy.com> <<mailto:rthomas@nhcharteracademy.com>>, Valerie Braimah
<vbraimah@citycharterschools.org>, Vanessa Jackson
<vanessajackson@collegiatecharterhighschool.org>, Yvette
King-Berg <ykingberg@ypics.org> <<mailto:ykingberg@ypics.org>>, bbauer
<bbauer@ghchs.com> <<mailto:bbauer@ghchs.com>>, erin.studer@chimeinstitute.org
<erin.studer@chimeinstitute.org> <<mailto:erin.studer@chimeinstitute.org>>
<<mailto:erin.studer@chimeinstitute.org>>
<pmagee@palihigh.org> <<mailto:pmagee@palihigh.org>>
<pmagee@palihigh.org> <<mailto:pmagee@palihigh.org>>

I'll try calling Lida from TFA.

On Fri, Jan 25, 2019 at 8:52 AM agoldring@laleadership.org
<<mailto:agoldring@laleadership.org>> <agoldring@laleadership.org>
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Sent from my iPhone

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Cc: Jason Rudolph <jrudolph@ccsa.org>; Cristina de Jesus <cdejesus@greendot.org>
<<mailto:cdejesus@greendot.org>>; Marcia Aaron <maaron@kippla.org>;
<<mailto:maaron@kippla.org>>; Johnathan Williams
<jwilliams@accelerated.org>; P
Hudnut <phudnut@icefps.org> <<mailto:phudnut@icefps.org>>; Yvette
King-Berg <ykingberg@ypics.org> <<mailto:ykingberg@ypics.org>>;
erin.studer@chimeinstitute.org <<mailto:erin.studer@chimeinstitute.org>>;
Edward Morris <emorris@endeavorcollegeprep.org>
<<mailto:emorris@endeavorcollegeprep.org>>; pmagee@palihigh.org
<pmagee@palihigh.org>; Oliver Sicat <osicat@ednovate.org>
<<mailto:osicat@ednovate.org>>; Valerie Braimah
<vbraimah@citycharterschools.org>; Vanessa Jackson
<vanessajackson@collegiatecharterhighschool.org>; Mark
Kleger-Heine <mkleger-heine@cwlosangeles.org>
<<mailto:mkleger-heine@cwlosangeles.org>>; Ana Ponce
<Ana.Ponce@caminonuevo.org> <<mailto:Ana.Ponce@caminonuevo.org>>; Natasha

RISKIN0032

Barriga <nbarriga@resoluteacademy.org>; Arina Goldring <agoldring@laleadership.org>; Richard Thomas <rthomas@nhcharteracademy.com> <rthomas@nhcharteracademy.com>; bbauer <bbauer@ghchs.com> <bbauer@ghchs.com>; Cassy Horton <chorton@ccsa.org> <chorton@ccsa.org>; Keith Dell'Aquila <KDellAquila@ccsa.org> <KDellAquila@ccsa.org>; Chris Copolillo <ccopolillo@ccsa.org> <ccopolillo@ccsa.org>; Luis Figueroa <lfigueroa@ccsa.org> <lfigueroa@ccsa.org>

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Executive Director
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310-593-3620

www.galsla.org

<https://linkprotect.cudasvc.com/url?a=http%3a%2f%2fwww.galsla.org&c=E,1,0KD2jKLQY6DBbQrqVaC_Sg6oxa19zgd369P368DnPDX0h40vHPpil7kLMhTyYy58M5tUcy42cyIBowT0fcXAC9A48aULDuiQIGSXyu_gfE-0AuNGfd4L&typo=1>

On Thu, Jan 24, 2019 at 12:36 PM Jason Rudolph <jrudolph@ccsa.org> wrote:

--

RISKIN0033

Ted Morris
Executive Director
Endeavor College Prep
(310) 600-8876

*sent from my iPhone. Please excuse formatting and typos.

<http://www.ypics.org>
<<https://linkprotect.cudasvc.com/url?a=http%3a%2f%2fwww.ypics.org%2f&c=E>
,1,kIh0bF8CL5p2mqvfdXpE-7mxKNdY04CbMckmB7fwfH0vi8iXItl4Spzwh0MQQbrpoXJ-1
b6fwWxtib_p-A5JtZpPqoafyoX05vrv2b96Y2Cuf0HLJtXTJC6tb1A,&typo=1>
10660 White Oak Ave, STE B101
Granada Hills CA 91344

<<https://linkprotect.cudasvc.com/url?a=http%3a%2f%2fmrharvey.ypics.org%2fwp-content%2fuploads%2fsites%2f10%2f2015%2f10%2fYPICS-email-footer.png&c=E>,1,X0_7Ki31y9JLSpCwnkH_19htdjCer0GEJ0xG3phITRfviISWPtH03z_4c-5mIo0ZEa
eL5I2z-ZT0icyb78dr6qC5Yz0fw7MliNeENAMVH5zyF0n0-Ghp&typo=1>

This message, and any attachments, is for the intended recipient(s) only, may contain information that is privileged, confidential and/or proprietary and subject to important terms and conditions. If you are not the intended recipient, please delete this message.

RISKIN0034

Subject: Re: <Urgent LAAC Call> Alignment on Strategy re: LAUSD Proposed Charter Moratorium Resolution
From: Cristina de Jesus
Date: 1/25/19, 9:15 PM
To: Yvette king-berg
CC: "emorris@endeavorcollegeprep.org" <emorris@endeavorcollegeprep.org>, "To: agoldring@laleadership.org" <agoldring@laleadership.org>, "Cc: Ana Ponce" <Ana.Ponce@caminonuevo.org>, Carrie Wagner <cwagner@galsla.org>, Cassy Horton <chorton@ccsa.org>, Chris Copolillo <ccopolillo@ccsa.org>, Emilio Pack <epack@stem-prep.org>, Jason Rudolph <jrudolph@ccsa.org>, Johnathan Williams <jwilliams@accelerated.org>,=?utf-8?B?S2VpdGggRGVsbOKAmUFxdWlsYQ==?= <KDellAquila@ccsa.org>, Luis Figueroa <lfigueroa@ccsa.org>, Marcia Aaron <maaron@kippla.org>, Mark Kleger-Heine <mkleger-heine@cwcclosangeles.org>, Natasha Barriga <nbarriga@resoluteacademy.org>, Oliver Sicat <osicat@ednovate.org>, P Hudnut <phudnut@icefps.org>, Richard Thomas <rthomas@nhcharteracademy.com>, Valerie Braimah <vbraimah@citycharterschools.org>, Vanessa Jackson <vanessajackson@collegiatecharterhighschool.org>, Yvette King-Berg <ykingberg@ypics.org>, bbauer <bbauer@ghchs.com>, "erin.studer@chimeinstitute.org" <erin.studer@chimeinstitute.org>, "pmagee@palihigh.org" <pmagee@palihigh.org>

And/or ask them to call and email Board members!

Sent from my iPhone

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Subject: Fwd: <Urgent LAAC Call> Alignment on Strategy re: LAUSD Proposed Charter Moratorium Resolution
To: Yvette King-Berg <ykingberg@gmail.com<<mailto:ykingberg@gmail.com>>>

Yvette King-Berg

Executive Director
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9400 Remick Avenue
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P (818) 305-2791 <tel:%28818%29%20305-2791>
F (818) 847-7659 <tel:%28818%29%20847-7659>

<http://www.ypics.org>
<https://linkprotect.cudasvc.com/url?a=http%3a%2f%2fwww.ypics.org%2f&c=E11Ts3A3zxpq0MqVZYzqN_ryxIL7PhFKCTeQCmEokgXgDi2_D2sGD79q53ohbtDhYaox0FbqJYFb6JEP4d0FvxhUVRhTC1qoeo8lDpwy_11Eoql3ERkfc8dM3S22&typo=1>
9400 Remick St
Pacoima CA 91331

<https://linkprotect.cudasvc.com/url?a=http%3a%2f%2fmrharvey.ypics.org%2fwp-content%2fuploads%2fsites%2f10%2f2015%2f10%2fYPICS-email-footer.png&c=E11tHjTuLnXmC0x0pL9qqyl9QHIE9ISF2ETyAyZkEXS8gYucs450QSn0sUqUeDka7oE0_0WTnGASH719zUPJYqDy2TGs1-PB0eoGSBiMAIjzXu_aQoyhPIFf0,,&typo=1>

RISKIN0035

----- Forwarded message -----

From: Edward Morris <emorris@endeavorcollegeprep.org>

Date: Fri, Jan 25, 2019 at 12:30 PM

Subject: Re: <Urgent LAAC Call> Alignment on Strategy re: LAUSD

Proposed Charter Moratorium Resolution

To: agoldring@laleadership.org

<<mailto:agoldring@laleadership.org>> <agoldring@laleadership.org>

<<mailto:agoldring@laleadership.org>> >

Cc: Ana Ponce <Ana.Ponce@caminonuevo.org>

<<mailto:Ana.Ponce@caminonuevo.org>>, Carrie Wagner <cwagner@galsla.org>

<<mailto:cwagner@galsla.org>>, Cassy Horton <chorton@ccsa.org>

<<mailto:chorton@ccsa.org>>, Chris Copolillo <ccopolillo@ccsa.org>

<<mailto:ccopolillo@ccsa.org>>, Cristina de Jesus <cdejesus@greendot.org>

<<mailto:cdejesus@greendot.org>>, Emilio Pack <epack@stem-prep.org>

<<mailto:epack@stem-prep.org>>, Jason Rudolph <jrudolph@ccsa.org>

<<mailto:jrudolph@ccsa.org>>, Johnathan Williams

<jwilliams@accelerated.org> <<mailto:jwilliams@accelerated.org>>, Keith

Dell'Aquila <KDellAquila@ccsa.org> <<mailto:KDellAquila@ccsa.org>>, Luis

Figueroa <lfigueroa@ccsa.org> <<mailto:lfigueroa@ccsa.org>>, Marcia Aaron

<<mailto:maaron@kippla.org>>, Mark Kleger-Heine

<<mailto:mkleger-heine@wclosangeles.org>>

<nbarriga@resoluteacademy.org> <<mailto:nbarriga@resoluteacademy.org>>, Natasha Barriga

Oliver Sicat <osicat@ednovate.org> <<mailto:osicat@ednovate.org>>, P

Hudnut <phudnut@icefps.org> <<mailto:phudnut@icefps.org>>, Richard Thomas

<rthomas@nhcharteracademy.com> <<mailto:rthomas@nhcharteracademy.com>>, Valerie Braimah <vbraimah@citycharterschools.org>

<<mailto:vbraimah@citycharterschools.org>>, Vanessa Jackson

<vanessajackson@collegiatecharterhighschool.org>

<<mailto:vanessajackson@collegiatecharterhighschool.org>>, Yvette

King-Berg <ykingberg@ypics.org> <<mailto:ykingberg@ypics.org>>, bbauer

<bbauer@ghchs.com> <<mailto:bbauer@ghchs.com>>,

<erin.studer@chimeinstitute.org> <<mailto:erin.studer@chimeinstitute.org>>

<<mailto:erin.studer@chimeinstitute.org>>

, pmagee@palihigh.org <<mailto:pmagee@palihigh.org>>

<pmagee@palihigh.org> <<mailto:pmagee@palihigh.org>>

I'll try calling Lida from TFA.

On Fri, Jan 25, 2019 at 8:52 AM agoldring@laleadership.org

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Sent from my iPhone

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The slogan idea is great. Key messages are important. Cassy, can the CCSA team take a stab at the slogans?

From: Emilio Pack <epack@stem-prep.org>

<<mailto:epack@stem-prep.org>>

Sent: Friday, January 25, 2019 8:41 AM

To: Carrie Wagner <cwagner@galsla.org>

<<mailto:cwagner@galsla.org>>

Cc: Jason Rudolph <jrudolph@ccsa.org>

<<mailto:jrudolph@ccsa.org>>; Cristina de Jesus <cdejesus@greendot.org>

<<mailto:cdejesus@greendot.org>>; Marcia Aaron <maaron@kippla.org>

<<mailto:maaron@kippla.org>>; Johnathan Williams

<jwilliams@accelerated.org> <<mailto:jwilliams@accelerated.org>>; P

Hudnut <phudnut@icefps.org> <<mailto:phudnut@icefps.org>>; Yvette

King-Berg <ykingberg@ypics.org> <<mailto:ykingberg@ypics.org>>;

<erin.studer@chimeinstitute.org> <<mailto:erin.studer@chimeinstitute.org>>;

RISKIN0036

Edward Morris <emorris@endeavorcollegeprep.org>; pimagee@palihigh.org
<pimagee@palihigh.org>; Oliver Sicat <osicat@ednovate.org>; Valerie Braimah
<vbraimah@citycharterschools.org>; Vanessa Jackson
<vanessajackson@collegiatecharterhighschool.org>; Mark Kleger-Heine <mkleger-heine@cwclosangeles.org>
<mkleger-heine@cwclosangeles.org>; Ana Ponce <Ana.Ponce@caminonuevo.org>; Natasha Barriga <nbarriga@resoluteacademy.org>; Arina Goldring <agoldring@laleadership.org>; Richard Thomas <rthomas@nhcharteracademy.com>; bbauer <bbauer@ghchs.com>; Cassy Horton <chorton@ccsa.org>; Keith Dell'Aquila <KDellAquila@ccsa.org>; Chris Copolillo <ccopolillo@ccsa.org>; Luis Figueroa <lfigueroa@ccsa.org>
<lfigueroa@ccsa.org>

Subject: Re: <Urgent LAAC Call> Alignment on
Strategy re: LAUSD Proposed Charter Moratorium Resolution

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<cwagner@galsla.org> wrote:

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My people will have GALS shirts on but we do need tshirts for people that are joining us and or a color that everyone can wear. We also should consider 5 key slogans.

Thanks,

Carrie Wagner

Executive Director

GALS LA

310-593-3620

www.galsla.org

<https://linkprotect.cudasvc.com/url?a=http%3a%2f%2fwww.galsla.org&c=E_1,0KD2jkLQY6DBbQrqVaC_Sg6oxa19zgd369P368DnPDX0h40vHPpil7kLMhTyYy58M5tUcy42cyIBowT0fcXAC9A48aULDuiQIGSXyu_gfE-0AuNGfd4L&typo=1>

RISKIN0037

On Thu, Jan 24, 2019 at 12:36 PM Jason

Rudolph <jrudolph@ccsa.org <<mailto:jrudolph@ccsa.org>>> wrote:

--

Ted Morris
Executive Director
Endeavor College Prep
(310) 600-8876

*sent from my iPhone. Please excuse formatting and typos.

<http://www.ypics.org>

<https://linkprotect.cudasvc.com/url?a=http%3a%2f%2fwww.ypics.org%2f&c=E,1,kIh0bF8CL5p2mqvfdXpE-7mxKNdY04CbMckmB7fwfH0vi8iXItl4Spzwh0MQQbrpoXJ-1b6fWxtib_p-A5JtZpPqoafyoX05vrv2b96Y2Cuf0HLJtXTJC6tb1A,&typo=1>

10660 White Oak Ave, STE B101

Granada Hills CA 91344

<https://linkprotect.cudasvc.com/url?a=http%3a%2f%2fmrharvey.ypics.org%2fwp-content%2fuploads%2fsites%2f10%2f2015%2f10%2fYPICS-email-footer.png&c=E,1,X0_7Ki31y9JLSpCwnkH_19htdjCer0GEJ0xG3phITRfviISWPtH03z_4c-5mIo0ZEaEl5I2z-ZT0icyb78dr6qC5Yz0fw7MliNeENAMVH5zyF0n0-Ghp&typo=1>

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RISKIN0038

Subject: Re: <Urgent LAAC Call> Alignment on Strategy re: LAUSD Proposed Charter Moratorium Resolution

From: Yvette King-Berg

Date: 1/26/19, 9:54 AM

To: Cristina de Jesus

CC: Yvette king-berg <ykingberg@gmail.com>, "emorris@endeavorcollegeprep.org" <emorris@endeavorcollegeprep.org>, "To: agoldring@laleadership.org" <agoldring@laleadership.org>, "Cc: Ana Ponce" <Ana.Ponce@caminonuevo.org>, Carrie Wagner <cwagner@galsla.org>, Cassy Horton <chorton@ccsa.org>, Chris Copolillo <ccopolillo@ccsa.org>, Emilio Pack <epack@stem-prep.org>, Jason Rudolph <jrudolph@ccsa.org>, Johnathan Williams <jwilliams@accelerated.org>, =?UTF-8?Q?Keith Dell=E2=80=99Aquila?= <KDellAquila@ccsa.org>, Luis Figueroa <lfigueroa@ccsa.org>, Marcia Aaron <maaron@kippla.org>, Mark Kleger-Heine <mkleger-heine@cwlosangeles.org>, Natasha Barriga <nbarriga@resoluteacademy.org>, Oliver Sicat <osicat@ednovate.org>, P Hudnut <phudnut@icefps.org>, Richard Thomas <rthomas@nhcharteracademy.com>, Valerie Braimah <vbraimah@citycharterschools.org>, Vanessa Jackson <vanessajackson@collegiatecharterhighschool.org>, bbauer <bbauer@ghchs.com>, "erin.studer@chimeinstitute.org" <erin.studer@chimeinstitute.org>, "pmagee@palihigh.org" <pmagee@palihigh.org>

Absolutely!

Yvette King-Berg

Executive Director
Youth Policy Institute Charter Schools
9400 Remick Avenue
Pacoima, CA 91331
P (818) 305-2791 <tel:%28818%29%20305-2791>
F (818) 847-7659 <tel:%28818%29%20847-7659>

<http://www.ypics.org>
<<https://linkprotect.cudasvc.com/url?a=http%3a%2f%2fwww.ypics.org%2f&c=E>>
,1,MfrcZYm5AYH-0Gw9dxA-uFKfRWLg9u_G0qMBZoYhNyEurKXCsZEL8Qo3W_sNRBY0gFhoX
SP_Sidu-CFTuIsIqhrGsLW2BvZz0hS1mgKwsj4okszUL7BEUqVVDMS&typo=1>
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VBT1A-8dITUgV7oxHxrdp-40WnEsx18jwLmj_9&typo=1>

On Fri, Jan 25, 2019 at 9:16 PM Cristina de Jesus <cdejesus@greendot.org <mailto:cdejesus@greendot.org> > wrote:

And/or ask them to call and email Board members!

Sent from my iPhone

On Jan 25, 2019, at 7:29 PM, Yvette King-berg <ykingberg@gmail.com <mailto:ykingberg@gmail.com> > wrote:

All,

Great suggestions! I spent the day reaching out to my vendors and inviting them to attend the rally with us. Also, I think it would be a great idea if CCSA could reach out to the greater Charter Community, LA County and anyone from the Kern County south to San Diego County. Several charter leaders from outside of LA asked me today how can they help. I told them to join us in LA on Tuesday. I am wondering if we should just send the word out, if you can join us in LA on Tuesday please do so. I am going to leave that up to Tyler and others, but at least wanted you to know that I think we need to think bigger and broader to get this done in such a short period of time.

In solidarity!
Yvette

----- Forwarded message -----

From: Yvette King-Berg <ykingberg@ypics.org>

RISKIN0039

Date: Fri, Jan 25, 2019 at 7:23 PM
Subject: Fwd: <Urgent LAAC Call> Alignment on Strategy
re: LAUSD Proposed Charter Moratorium Resolution
To: Yvette King-Berg <ykingberg@gmail.com>
<ykingberg@gmail.com>

Yvette King-Berg

Executive Director
Youth Policy Institute Charter Schools
9400 Remick Avenue
Pacoima, CA 91331
P (818) 305-2791 <tel:%28818%29%20305-2791>
F (818) 847-7659 <tel:%28818%29%20847-7659>

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<https://linkprotect.cudasvc.com/url?a=http%3a%2f%2fwww.ypics.org%2f&c=E,1,1Ts3A3zxpqaQmqVZYzqN_ryxIL7PhFKCTeQCmEokgXgDi2_D2sGD79q53ohbtDhYaox0FbqJYFb6JEP4dtoFvxhUVRhTC1qoeo8lDpwy_11Eoql3ERkfc8dM3S22&typo=1>
9400 Remick St
Pacoima CA 91331

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----- Forwarded message -----

From: Edward Morris <emorris@endeavorcollegeprep.org>

<emorris@endeavorcollegeprep.org> >
Date: Fri, Jan 25, 2019 at 12:30 PM
Subject: Re: <Urgent LAAC Call> Alignment on Strategy

re: LAUSD Proposed Charter Moratorium Resolution

To: agoldring@laleadership.org

<agoldring@laleadership.org> <agoldring@laleadership.org>

<agoldring@laleadership.org>
Cc: Ana Ponce <Ana.Ponce@caminonuevo.org>
<Ana.Ponce@caminonuevo.org>, Carrie Wagner <cwagner@galsla.org>
<cwagner@galsla.org>, Cassy Horton <chorton@ccsa.org>
<chorton@ccsa.org>, Chris Copolillo <ccopolillo@ccsa.org>
<ccopolillo@ccsa.org>, Cristina de Jesus <cdejesus@greendot.org>
<cdejesus@greendot.org>, Emilio Pack <epack@stem-prep.org>
<epack@stem-prep.org>, Jason Rudolph <jrudolph@ccsa.org>
<jrudolph@ccsa.org>, Johnathan Williams
<jwilliams@accelerated.org> <jwilliams@accelerated.org>, Keith
Dell'Aquila <KDellAquila@ccsa.org> <KDellAquila@ccsa.org>, Luis
Figueroa <lfigueroa@ccsa.org> <lfigueroa@ccsa.org>, Marcia Aaron
<maaron@kippla.org> <maaron@kippla.org>, Mark Kleger-Heine
<mkleger-heine@wclosangeles.org>, Natasha Barriga
<nbarriga@resoluteacademy.org> <nbarriga@resoluteacademy.org>,
Oliver Sicat <osicat@ednovate.org> <osicat@ednovate.org>, P
Hudnut <phudnut@icefps.org> <phudnut@icefps.org>, Richard Thomas
<rthomas@nhcharteracademy.com> <rthomas@nhcharteracademy.com>,
Valerie Braimah <vbraimah@citycharterschools.org>
<vbraimah@citycharterschools.org>, Vanessa Jackson
<vanessajackson@collegiatecharterhighschool.org>
<vanessajackson@collegiatecharterhighschool.org>, Yvette
King-Berg <ykingberg@ypics.org> <ykingberg@ypics.org>, bbauer
<bbauer@ghchs.com> <bbauer@ghchs.com>,
<erin.studer@chimeinstitute.org> <erin.studer@chimeinstitute.org>
<erin.studer@chimeinstitute.org> <erin.studer@chimeinstitute.org>

, pimagee@palihigh.org <pimagee@palihigh.org>

<pimagee@palihigh.org> <pimagee@palihigh.org>

I'll try calling Lida from TFA.

On Fri, Jan 25, 2019 at 8:52 AM

agoldring@laleadership.org <agoldring@laleadership.org>
<agoldring@laleadership.org> <agoldring@laleadership.org> wrote:

RISKIN0040

Thank you, Carrie! Parental Voice and Educational choice should be included in the slogan.

Sent from my iPhone

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Sent: Friday, January 25, 2019 8:41 AM
To: Carrie Wagner <cwagner@galsla.org>
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Cc: Jason Rudolph <jrudolph@ccsa.org>
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<<mailto:maaron@kippla.org>>; Johnathan Williams <jwilliams@accelerated.org> <<mailto:jwilliams@accelerated.org>>; P
Hudnut <phudnut@icefps.org> <<mailto:phudnut@icefps.org>>; Yvette
King-Berg <ykingberg@ypics.org> <<mailto:ykingberg@ypics.org>>;
<erin.studer@chimeinstitute.org> <<mailto:erin.studer@chimeinstitute.org>>;
Edward Morris <emorris@endeavorcollegeprep.org>
<<mailto:emorris@endeavorcollegeprep.org>>; pimagee@palihigh.org
<<mailto:pimagee@palihigh.org>>; Oliver Sicat <osicat@ednovate.org>
<<mailto:osicat@ednovate.org>>; Valerie Braimah <vbraimah@citycharterschools.org>
<<mailto:vbraimah@citycharterschools.org>>; Vanessa Jackson <vanessajackson@collegiatecharterhighschool.org>
<<mailto:vanessajackson@collegiatecharterhighschool.org>>; Mark
Kleger-Heine <mkleger-heine@cwlosangeles.org>
<<mailto:mkleger-heine@cwlosangeles.org>>; Ana Ponce <Ana.Ponce@caminonuevo.org> <<mailto:Ana.Ponce@caminonuevo.org>>; Natasha
Barriga <nbarriga@resoluteacademy.org>; Arina Goldring <agoldring@laleadership.org> <<mailto:agoldring@laleadership.org>>;
Richard Thomas <rthomas@nhcharteracademy.com>; bbauer <bbauer@ghchs.com>
<<mailto:bbauer@ghchs.com>>; Cassy Horton <chorton@ccsa.org>
<<mailto:chorton@ccsa.org>>; Keith Dell'Aquila <KDellAquila@ccsa.org>
<<mailto:KDellAquila@ccsa.org>>; Chris Copolillo <ccopolillo@ccsa.org>
<<mailto:ccopolillo@ccsa.org>>; Luis Figueroa <lfigueroa@ccsa.org>
<<mailto:lfigueroa@ccsa.org>> >
Subject: Re: <Urgent LAAC Call>
Alignment on Strategy re: LAUSD Proposed Charter Moratorium Resolution

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RISKIN0041

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Executive Director

GALS LA

310-593-3620

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On Thu, Jan 24, 2019 at 12:36 PM Jason

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--

Ted Morris
Executive Director
Endeavor College Prep
(310) 600-8876

*sent from my iPhone. Please excuse formatting and typos.

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<https://linkprotect.cudasvc.com/url?a=http%3a%2f%2fwww.ypics.org%2f&c=E,1,kIh0bF8CL5p2mqvfdXpE-7mxKNdY04CbMckmB7fwfH0vi8iXItl4SpzwhMQQbrpoXJ-1b6fWxtib_p-A5JtZpPqoafyoX05rvr2b96Y2Cuf0HLJtXTJC6tb1A,&typo=1>
10660 White Oak Ave, STE B101
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<https://linkprotect.cudasvc.com/url?a=http%3a%2f%2fmrharvey.ypics.org%2fwp-content%2fuploads%2fsites%2f10%2f2015%2f10%2fYPICS-email-footer.png&c=E,1,X0_7Ki31y9JLSpCwnkH_19htdjCer0GEJ0xG3phITRfviISWPtH03z_4c-5mIo0ZEaEl5I2z-ZT0icyb78dr6qC5Yz0fw7MliNeENAMVH5zyF0n0-Ghp&typo=1>

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10660 White Oak Ave, STE B101
Granada Hills CA 91344

RISKIN0042

<https://linkprotect.cudasvc.com/url?a=http%3a%2f%2fmrharvey.ypics.org%2fwp-content%2fuploads%2fsites%2f10%2f2015%2f10%2fYPICS-email-footer.png&c=E,1,gN_FNxU6CPKFPBArwb8hYJxSXhgf1DG9w0EMvrkNklSl7Wnc0L9_4B02Lx9RAH0HEGhwR9M2fb-InYXIqNfc6Gc_0WYlYVscfCAkTI9_0dnqKY0d3iEeCGPj74bl&typo=1>

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Subject: <Review Req'd> LAAC March Meeting Agenda & Materials

From: Luis Figueroa

Date: 3/6/19, 12:36 PM

To: Emilio Pack <epack@stem-prep.org>, C DeJesus <cdejesus@greendot.org>, Marcia Aaron <maaron@kippla.org>, Johnathan Williams <jwilliams@accelerated.org>, bbauer <bbauer@ghchs.com>, Yvette King-Berg <ykingberg@ypics.org>, P Hudnut <phudnut@icefps.org>, Oliver Sicat <osicat@ednovate.org>, Mark Kleger-Heine <mkleger-heine@cwclosangeles.org>, Edward Morris <emorris@endeavorcollegeprep.org>, Vanessa Jackson <vanessajackson@collegiatecharterhighschool.org>, "erin.studer@chimeinstitute.org" <erin.studer@chimeinstitute.org>, "pmagee@palihigh.org" <pmagee@palihigh.org>, Valerie Braimah <vbraimah@citycharterschools.org>, Carrie Wagner <cwagner@galsla.org>, "nbarriga@resoluteacademy.org" <nbarriga@resoluteacademy.org>, Richard Thomas <rthomas@nhcharteracademy.com>, "agoldring@laleadership.org" <agoldring@laleadership.org>

CC: Myrna Castrejon <mcastrejon@ccsa.org>, Gregory McGinity <gmcginity@ccsa.org>, Lee Condon <lcondon@ccsa.org>, Alix Fraser <afraser@ccsa.org>, Cassy Horton <chorton@ccsa.org>, =?utf-8?B?S2VpdGggRGVsbOKAmUFxdWlsYQ==?= <KDellAquila@ccsa.org>, "Chris Copolillo" <ccopolillo@ccsa.org>, Jason Rudolph <jrudolph@ccsa.org>, "Ebony Wheaton" <ewheaton@ccsa.org>, Sharon Hicks <shicks@ccsa.org>

Dear LAAC Members -

We are looking forward to seeing many of you tomorrow for our March meeting. Attached, you will find our LAAC March Meeting Agenda and 2019 Legislative Session pre-reading that is also hyperlinked within the document. We will aim to begin promptly at 9AM at the CCSA office. If you have any questions / concerns day of, please feel free to give me a call / text directly at (213) 238 - 9105.

LAAC March Meeting

Date: March 7th, 2019

Address: 250 E. 1st Street, 10th Floor, Los Angeles, CA 90012

Time: 9:00AM – 12:00PM

Food: Fresh Fruit, Bagels, Muffins, Pastries, and Coffee (Available starting at 8:30AM)

Best,

Luis

--

Luis Figueroa

Director, Regional Advocacy - Los Angeles

California Charter Schools Association

Cell: (213) 238-9105

Email: lfigueroa@ccsa.org <mailto:lfigueroa@ccsa.org>

Website: www.ccsa.org <http://www.ccsa.org>

Registration for the 26th Annual California Charter Schools Conference is open! Register today and save!
<https://charterconference.org/2019/registration/> The conference will be held March 11-14, 2019 at the Sacramento Convention Center. We look forward to seeing you there!

RISKIN0044

image001.jpg

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RISKIN0045

Exhibit B

From: Francis Reading <freading@accelerated.org>
Sent: Monday, December 10, 2018 9:39 AM PST
To: Kari Rivera <krivera@accelerated.org>; STAFF <STAFF@accelerated.org>
Subject: Re: 2018-2019 Safety Plan Final
Attachment(s): "TAS_WAHS School Safety Plan 2018-19 .pdf"

Dear Staff,
I included TAS 2 information in the safety plan.
Thank You,
Francis

From: Kari Rivera <krivera@accelerated.org>
Date: Thursday, December 6, 2018 at 5:15 PM
To: STAFF <STAFF@accelerated.org>
Subject: 2018-2019 Safety Plan Final

Dear staff,

Please review the attached Safety Plan for 2018-2019. The final version of the plan was approved on December 6, 2018 at the Safety Committee Meeting. We will begin drafting the 2019-2020 Safety Plan at our next meeting on January 24, 2019; all are invited to attend.

Sincerely,
Kari Rivera

NOTE: This message contains information which may be confidential and/or privileged. It is intended solely for the addressee. If you are not the intended recipient, you may not use, copy, distribute, or disclose any information contained in the message. If you have received this transmission in error, please notify the sender by reply e-mail and delete this message. Please note, all rights of concurrent review and comment are hereby reserved. Thank you.

The Accelerated Schools Title IX Policy

The following is information regarding your rights and responsibilities regarding filing a Title IX Complaint.

Title IX Coordinator Contact Information

All complaints should be sent to our Title IX Coordinator, who can be reached at:

- Susan Raudry – Accelerated Charter Elementary School (323) 846-6694; sraudry@accelerated.org
- Francis Reading – The Accelerated School (323) 235-6343; freading@accelerated.org
- Rebecca Handzel – Wallis Annenberg High School (323) 235-6343; rhandzel@accelerated.org

Your Rights and Responsibilities Under Title IX

(a) You have the right to fair and equitable treatment and you shall not be discriminated against based on your sex.

(b) You have the right to be provided with an equitable opportunity to participate in all academic extracurricular activities and athletics offered by The Accelerated Schools.

(c) You have the right to inquire of the athletic director of your school as to the athletic opportunities offered by The Accelerated Schools.

(d) You have the right to apply for athletic scholarships.

(e) You have the right to receive equitable treatment and benefits in the provision of all of the following:

- Equipment and supplies.
- Scheduling of games and practices.
- Transportation and daily allowances.
- Access to tutoring.
- Locker rooms.
- Practice and competitive facilities.
- Medical and training facilities and services.

(f) You have the right to have access to our Title IX Coordinator regarding gender equity laws. Please see above for this Coordinator's contact information.

(g) You have the right to file a confidential discrimination complaint with the United States Office for Civil Rights or California Department of Education if you believe you have been discriminated against or if you believe you have received unequal treatment on the basis of your sex. See below for more information regarding how to file a complaint.

- (h) You have the right to pursue civil remedies if you have been discriminated against.
- (i) You have the right to be protected against retaliation if you file a discrimination complaint.
- (j) You can find out more information regarding your rights and access information on gender equity laws from the following resources:

- California Interscholastic Federation: <http://www.cifstate.org/governance/equity/index>
- California Department of Education, Office for Equal Opportunity: <http://www.cde.ca.gov/re/di/eo/dutytoprotect.asp>
- United States Department of Education, Office for Civil Rights: <https://www2.ed.gov/about/offices/list/ocr/frontpage/pro-students/sex-pr.html>

How to File a Complaint Under Title IX

- (a) You can find more information regarding how to file a complaint as follows:
 - The United States Office for Civil Rights website: <https://www2.ed.gov/about/offices/list/ocr/docs/howto.html?src=rt>.
 - California Department of Education website: <http://www.cde.ca.gov/re/di/eo/complaint.asp>
 - The Accelerated Schools' Uniform Complaint Procedures ("UCP") or Title IX/Harassment/Intimidation/Discrimination/Bullying Policy. Please see school office manager for a complete copy of these policies.
- (b) A complaint regarding discrimination or harassment based on sex must ordinarily be filed with the U.S. Office for Civil Rights within 180 days of the last act of discrimination. If your complaint involves matters that occurred longer than this and you are requesting a waiver, you will be asked to show good cause why you did not file your complaint within the 180-day period. If you have questions about your situation, you can contact the California branch of the Office for Civil Rights at the address listed below. A complaint filed with The Accelerated Schools under our UCP alleging unlawful discrimination, harassment, intimidation or bullying must be initiated no later than six (6) months from the date when the alleged unlawful discrimination, harassment, intimidation or bullying occurred, or six (6) months from the date when the complainant first obtained knowledge of the facts of the alleged unlawful discrimination, harassment, intimidation or bullying.
- (c) The U.S. Office for Civil Rights has its own policies and procedures for investigating complaints. Please review the above link for more information about this process. A complaint filed with The Accelerated Schools under our UCP or Title IX/ Harassment/ Intimidation/ Discrimination/ Bullying policy will be investigated in compliance with those policies.
- (d) There are a variety of ways to file your complaint. You can use the U.S. Office for Civil Rights electronic complaint form filed directly through their website; or mail, email, or send by facsimile your own letter or a completed copy of the Office for Civil Rights Discrimination Complaint Form.

- The electronic complaint form is available at <https://www2.ed.gov/about/offices/list/ocr/complaintintro.html>
- You can send a completed version of this form or your own letter via email, facsimile, or regular mail to the following addresses:

**San Francisco Office
Office for Civil Rights
U.S. Department of Education
50 United Nations Plaza
Mail Box 1200, Room 1545
San Francisco, CA 94102**

**Telephone: 415-486-5555
FAX: 415-486-5570; TDD: 800-877-8339
Email: ocr.sanfrancisco@ed.gov or ocr@ed.gov**

To file a UCP or complaint under our Title IX/ Harassment/ Intimidation/ Discrimination/ Bullying complaint directly with The Accelerated Schools, please follow procedures set forth in those policies.

DECLARATION OF ROBERT D. SKEELS

I, ROBERT D. SKEELS, declare:

1. I am an attorney licensed to practice law in the State of California. I represent the Petitioner in this action.

2. On December 30, 2019 The Accelerated Schools' ("TAS") attorney of record, Jeffrey L. Anderson, contacted me by telephone requesting an extension to answer the 12/3/19 Petition or to produce responsive records in an attempt to settle the matter without further litigation. My client, Adrian Riskin, graciously granted the extension.

3. Attached as *Exhibit A* is a true and correct copy of an email I received from Jeffrey L. Anderson dated December 30, 2019.

4. Attached as *Exhibit B* is a true and correct copy of an email I received from Jeffrey L. Anderson dated January 28, 2020.

5. Attached as *Exhibit C* is a true and correct copy of an email I sent to Jeffrey L. Anderson dated January 29, 2020.

6. Attached as *Exhibit D* is a true and correct copy of an email I received from Jeffrey L. Anderson dated January 31, 2020.

7. Attached as *Exhibit E* is a true and correct copy of an email I received from Jeffrey L. Anderson dated February 13, 2020.

8. Attached as *Exhibit F* is a true and correct copy of an email I received from Jeffrey L. Anderson dated March 18, 2020.

9. Attached as *Exhibit G* is a true and correct copy of an email I received from Jeffrey L. Anderson dated June 16, 2020.

10. On June 18, 2020 at 11:15 A.M. I called TAS' attorney of record, Jeffrey L. Anderson, in advance of the July 7, 2020 Trial Setting Conference and spoke with him for 11 minutes regarding several issues including, including a fees statement, potential settlement agreement clauses, favorably scheduling the hearing for TAS, and production of responsive records.

1 11. Attached as *Exhibit H* is a true and correct copy of an email I sent to
2 Jeffrey L. Anderson dated June 22, 2020.

3 12. Attached as *Exhibit I* is a true and correct copy of an email I sent to
4 Jeffrey L. Anderson dated September 19, 2020.

5 13. Attached as *Exhibit J* is a true and correct copy of an email I sent to
6 Jeffrey L. Anderson dated October 29, 2020.

7 14. Attached as *Exhibit K* is a true and correct copy of an email and attachment
8 items (1), (4), and (5) I received from Young, Minney & Corr, LLP Legal Assistant Josie
9 Onishi, on behalf of Jeffrey L. Anderson dated October 30, 2020.

10 15. Attached as *Exhibit L* is a true and correct copy of an email with its pdf
11 attachment that I sent to Young, Minney & Corr, LLP 's Wayne K. Strumpfer and
12 Jeffrey L. Anderson dated November 16, 2020.

13 16. Attached as *Exhibit M* is a true and correct copy of an email and the
14 attachment item I received from Young, Minney & Corr, LLP Legal Assistant Josie Onishi,
15 on behalf of Jeffrey L. Anderson dated December 10, 2020.

16 17. Attached as *Exhibit N* is a true and correct copy of an email with its pdf
17 attachment that I sent to Young, Minney & Corr, LLP 's Wayne K. Strumpfer and
18 Jeffrey L. Anderson dated January 12, 2021.

19 18. On January 14, 2021 at 3:57 A.M. I called TAS' attorney of record, Jeffrey
20 L. Anderson, at his request, and spoke with him for 22 minutes regarding several issues
21 including possibly settling prior to the filing deadlines, the issue of the collateral source
22 documents, and initial discussion of possible preparation of the joint notebook preferred
23 by the court.

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28 //

1 I declare under penalty of perjury under the laws of the State of California that the
2 foregoing is true and correct.

3 Executed on this the 20th day of January, 2021 in Los Angeles, California.

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7 Robert D. Skeels, Esq.

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Exhibit A

From: **Jeffrey L. Anderson** janderson@mycharterlaw.com 
Subject: Riskin v. The Accelerated Schools; Confirmation of 15-day extension of time of deadline to respond to Verified Petition/Complaint
Date: December 30, 2019 at 15:55 PM
To: rdsathene@alumni.ucla.edu
Cc: YMC - Litigation Support YMCLitigationSupport@mycharterlaw.com

JA

Dear Mr. Skeels:

This will confirm your gracious grant of an extension of time from January 16, 2020, up to and including Friday, January 31, 2020, for Defendant to respond to the Verified Petition/Complaint filed on behalf of your client, Adrian Riskin.

Also, please direct any further communications by you or your client regarding this litigation or the underlying PRA Requests to me rather than at The Accelerated Schools.

I appreciate your courtesy and cooperation in this matter.

Best regards,

Jeffrey L. Anderson

Attorney at Law | Sacramento Office



Young, Minney & Corr, LLP

655 University Ave, Suite 150, Sacramento, CA 95825

janderson@mycharterlaw.com

T: 916.646.1400 | F: 916.646.1300 | C: 916.397.8418

www.mycharterlaw.com



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Exhibit B

From: **Jeffrey L. Anderson** janderson@mycharterlaw.com 
Subject: Riskin v. The Accelerated Schools
Date: January 28, 2020 at 11:57 AM
To: Robert D. Skeels rdsathene@ucla.edu
Cc: Robert D. Skeels rdsathene@alumni.ucla.edu

JA

Dear Mr. Skeels:

Are you able to grant a further extension of time from January 31, 2020 up to and including Friday, February 14, 2020, for TAS to respond to your client's writ petition?

As I indicated in our telephone conversation yesterday, we are diligently working on responding to the six (6) PRA Requests at issue. My hope is that an additional extension of time will enable us to provide the responsive documents to you prior to February 14th.

Please let me know asap.

Best regards,

Jeffrey L. Anderson

Attorney at Law | Sacramento Office



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Exhibit C

From: Robert D. Skeels rdsathene@ucla.edu
Subject: Re: Riskin v. The Accelerated Schools
Date: January 29, 2020 at 11:15 AM
To: Jeffrey L. Anderson janderson@mycharterlaw.com
Cc: Robert D. Skeels rdsathene@alumni.ucla.edu



On Jan 28, 2020, at 13:41, Jeffrey L. Anderson wrote:

Thanks. I'll await your response.

Dear Mr. Anderson:

Good news. My client is amenable to "grant[ing] a further extension of time from January 31, 2020 up to and including Friday, February 14, 2020, for TAS to respond".

However, they would like a commitment from your client to provide a certain number of responsive records monthly until all of the appropriate records are disclosed as a condition.

Generally, with Business Improvement Districts (BID), my client has accepted a commitment of 3,000 responsive records a month. Is that a number your client foresees as realistic, or should we settle on another figure?

Sincerely,

Robert D. Skeels
Attorney and Counselor at Law
USN ESWS '85, UCLA BA '14, PCL JD '18
rdsathene@alumni.ucla.edu

"Problem posing education does not and cannot serve the interests of the oppressor" — Paulo Freire

Exhibit D

From: Jeffrey L. Anderson janderson@mycharterlaw.com 
Subject: RE: Riskin v. The Accelerated Schools
Date: January 31, 2020 at 15:58 PM
To: Robert D. Skeels rdsathene@ucla.edu
Cc: Robert D. Skeels rdsathene@alumni.ucla.edu, YMC - Litigation Support YMCLitigationSupport@mycharterlaw.com

JA

Dear Mr. Skeels:

Sorry for the delay in responding to your email on Wednesday regarding your proposal that as a proposed condition for granting my request for a further extension of time for TAS to respond to the Petition, that TAS agree to commit to produce a quantified number of documents each month until the production process is complete. While we appreciate your willingness to offer a creative option for the production of documents by TAS, we are presently engaged in a good faith effort to produce non-privileged and non-exempt documents as quickly as possible. In short, TAS does not anticipate such an elongated process that would doubtlessly require our client to grant further extensions of time that would doubtlessly be violative of court deadlines and procedural requirements.

Accordingly, since the extension of time that you previously granted is expiring today, we elected to simply file an Answer on behalf of TAS today. Attached is a courtesy copy. You will also receive a hard copy in the mail.

Please let me know if you have any questions regarding this matter.

Best regards,

Jeffrey L. Anderson

Attorney at Law | Sacramento Office



Young, Minney & Corr, LLP

655 University Ave, Suite 150, Sacramento, CA 95825

janderson@mycharterlaw.com

T: 916.646.1400 | F: 916.646.1300 | C: 916.397.8418

www.mycharterlaw.com



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From: Robert D. Skeels <rdsathene@ucla.edu>
Sent: Wednesday, January 29, 2020 11:16 AM
To: Jeffrey L. Anderson <janderson@mycharterlaw.com>
Cc: Robert D. Skeels <rdsathene@alumni.ucla.edu>
Subject: Re: Riskin v. The Accelerated Schools
Importance: High

On Jan 28, 2020, at 13:41, Jeffrey L. Anderson wrote:

Thanks. I'll await your response.

Dear Mr. Anderson:

Good news. My client is amenable to "grant[ing] a further extension of time from January 31, 2020 up to and including Friday, February 14, 2020, for TAS to respond".

However, they would like a commitment from your client to provide a certain number of responsive records monthly until all of the appropriate records are disclosed as a condition.

Generally, with Business Improvement Districts (BID), my client has accepted a commitment of 3,000 responsive records a month. Is that a number your client foresees as realistic, or should we settle on another figure?

Sincerely,

Robert D. Skeels

Attorney and Counselor at Law

USN ESWS '85, UCLA BA '14, PCL JD '18

rdsathene@alumni.ucla.edu

"Problem posing education does not and cannot serve the interests of the oppressor" — Paulo Freire



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Genera...AL.pdf

Exhibit E

From: Jeffrey L. Anderson janderson@mycharterlaw.com 
Subject: Riskin v. The Accelerated Schools -- SETTLEMENT PRIVILEGED DOCUMENT (Evid. Code section 1152)
Date: February 13, 2020 at 12:00 PM
To: Robert D. Skeels rdsathene@ucla.edu

JA

Dear Mr. Skeels:

I'm just checking in with you to provide an update on our efforts to produce to you non-privileged, non-exempt, public records that are responsive to the six (6) CPRA requests at issue in the above-referenced litigation. It looks like we will be in a position to produce the documents to you by the end of this month. I will provide a further update regarding a specific production date asap.

Additionally, after the documents are produced, we would like to engage in the process of resolving the case, including Petitioner's claim for attorneys' fees. To pave the way for that process, can you please give me an initial demand for fees?

Thank you very much.

Best regards,

Jeffrey L. Anderson

Attorney at Law | Sacramento Office



Young, Minney & Corr, LLP
655 University Ave, Suite 150, Sacramento, CA 95825
janderson@mycharterlaw.com
T: 916.646.1400 | F: 916.646.1300 | C: 916.397.8418
www.mycharterlaw.com   

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Exhibit F

From: Jeffrey L. Anderson janderson@mycharterlaw.com 
Subject: Riskin v. The Accelerated Schools; Update on production of non-privileged and non-exempt responsive documents
Date: March 18, 2020 at 10:47 AM
To: Robert D. Skeels rdsathene@ucla.edu, Robert D. Skeels rdsathene@alumni.ucla.edu
Cc: Paul C. Minney pminney@mycharterlaw.com, YMC - Litigation Support YMCLitigationSupport@mycharterlaw.com

JA

Dear Mr. Skeels:

I am sending you this email to update you on our efforts, on behalf of The Accelerated Schools, to produce non-privileged and non-exempt records responsive to the six (6) CPRA Request at issue in the above-referenced litigation.

As I am sure that you understand, the expanding Coronavirus crisis that has now led to massive shutdowns of private business and governmental entities has wreaked havoc on our ability to complete the task of compiling, reviewing and producing the documents requested by Mr. Riskin.

Please bear with us during this difficult time. We will do our best to produce the documents as soon as we can.

Thank you for your patience.

Best regards,

Jeffrey L. Anderson

Attorney at Law | Sacramento Office



Young, Minney & Corr, LLP

655 University Ave, Suite 150, Sacramento, CA 95825

janderson@mycharterlaw.com

T: 916.646.1400 | F: 916.646.1300 | C: 916.397.8418

www.mycharterlaw.com



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Exhibit G

From: **Jeffrey L. Anderson** janderson@mycharterlaw.com 
Subject: Riskin v. The Accelerated Schools; Request to Meet and Confer re Settlement -- PRIVILEGED SETTLEMENT
COMMUNICATION (Evid. Code section 1152)
Date: June 16, 2020 at 16:30 PM
To: Robert D. Skeels rdsathene@ucla.edu, Robert D. Skeels rdsathene@alumni.ucla.edu
Cc: Paul C. Minney pminney@mycharterlaw.com, Wayne K. Strumpfer wstrumpfer@mycharterlaw.com, YMC - Litigation Support
YMCLitigationSupport@mycharterlaw.com

JA

Dear Mr. Skeels:

The above-referenced matter has been languishing for a while now, largely due to the widespread Covid-19 pandemic-related school and court closures. The virtual dead stop closures significantly delayed our ability to aggregate the documents and prepare the production process. But, as you know, things are rumbling back to life and the school is now poised to produce, in the near future, non-privileged documents that are responsive to the six (6) PRA Requests that are at issue in your client's Petition and Complaint. Additionally, the trial setting conference presently set for July 7, 2020, provides further impetus for the parties to attempt to work together to resolve this litigation.

For these reasons, I would like to schedule a conference call with you to discuss the timing of the document production, the terms of a Settlement and Release Agreement (that my law firm will prepare and send to you for your review) including confidentiality and non-disparagement provisions, and a reasonable monetary component (attorneys' fees) required by your client as consideration for his agreeing to a complete waiver and release of all known and unknown claims (Civil Code section 1542).

Please let me know a convenient time for us to schedule a call to discuss these matters. I look forward to hearing back from you regarding your availability and working with you toward negotiating a mutually agreeable resolution.

Best regards,

Jeffrey L. Anderson

Attorney at Law | Sacramento Office



Young, Minney & Corr, LLP

655 University Ave, Suite 150, Sacramento, CA 95825

janderson@mycharterlaw.com

T: 916.646.1400 | F: 916.646.1300 | C: 916.397.8418

www.mycharterlaw.com



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Exhibit H

From: Robert D. Skeels rdsathene@g.ucla.edu
Subject: Invoices for ordinary costs and attorney's fees in 19STCP05135 Riskin v. TAS
Date: June 22, 2020 at 10:07 AM
To: Jeffrey L. Anderson janderson@mycharterlaw.com

RS

Dear Mr. Anderson:

As per our conversation last week regarding a possible settlement in the matter of case 19STCP05135 Riskin v. The Accelerated Schools, please find attached: 1) the current ordinary costs of litigation that have been billed to my client to date; 2) an accounting of reasonable attorney fees and paralegal fees.

Summary of fees:

Ordinary Costs of Litigation

\$566.27

Attorney Fees

29.6 hours at attorney rate of \$235 per billable hour \$6956.00
4.9 hours at paralegal rate of \$65 per billable hour \$318.50

Total fees \$7274.50

Please let me know if you have any questions.

Sincerely,

Robert D. Skeels

Attorney and Counselor at Law
USN EWSWS '85, UCLA BA '14, PCL JD '18
rdsathene@alumni.ucla.edu

ROBERT D. SKEELS

Attorney and Counselor
at Law

132 North Westlake Avenue
Los Angeles, CA 90026

rdsathene@alumni.ucla.edu
rdsathene@sbcglobal.net

(213) 234-8561

PCL JD '18

UCLA BA '14

USN EWSWS '85

SBN 325896

June 21, 2020

Jeffrey L. Anderson, Esq.
Young, Minney & Corr, LLP
655 University Ave, Suite 150
Sacramento, CA 95825

Via electronic mail to <janderson@mycharterlaw.com>

Re: Ordinary Costs of Litigation in Case Number 19STCP05135, Adrian Riskin v. The Accelerated Schools

Dear Mr. Anderson:

Please find the following to be the current ordinary costs of litigation that have been billed to my client to date.

Sincerely,



Robert D. Skeels, Esq.

| Date | 19STCP05135 Itemized | Cost |
|------------|---|--------|
| 12/04/2019 | OneLegal (Inv. 12156019) for Riskin TAS001 Petition filing | 448.65 |
| 01/12/2020 | Staples (Ord. 2122377452) printing petition for service TAS001 11/30/2019 | 25.32 |
| 01/12/2020 | One Legal (Inv. 12168534) filing summons TAS001 12/11/2019 | 13.65 |
| 01/12/2020 | One Legal (Inv. 12184634) filing proof of service TAS001 12/19/2019 | 13.65 |
| 01/12/2020 | Oswaldo Lopez (# 0086001) services of process TAS001 12/19/2019 | 65.00 |

| | | | |
|--|--|---|----------|
| | | <i>Total ordinary costs of litigation</i> | \$866.27 |
|--|--|---|----------|



20200621-
fees-1...tas.pdf

ROBERT D SKEELS

Attorney and Counselor
at Law

132 North Westlake Avenue
Los Angeles, CA 90026

rdsathene@alumni.ucla.edu
rdsathene@sbcglobal.net

(213) 234-8561

PCL JD '18

UCLA BA '14

USN ESWVS '85
SBN 325896

June 21, 2020

Jeffrey L. Anderson, Esq.
Young, Minney & Corr, LLP
655 University Ave, Suite 150
Sacramento, CA 95825

Via electronic mail to <janderson@mycharterlaw.com>

Re: Ordinary Costs of Litigation in Case Number 19STCP05135, Adrian Riskin v. The
Accelerated Schools

Dear Mr. Anderson:

Please find the following to be the current ordinary costs of litigation that have been
billed to my client to date.

Sincerely,



Robert D. Skeels, Esq.

| Date | 19STCP05135 Itemized | Cost |
|------------|---|-----------------|
| 12/04/2019 | OneLegal (Inv. 12156019) for Riskin TAS001 Petition filing | 448.65 |
| 01/12/2020 | Staples (Ord. 2122377452) printing petition for service TAS001 11/30/2019 | 25.32 |
| 01/12/2020 | One Legal (Inv. 12168534) filing summons TAS001 12/11/2019 | 13.65 |
| 01/12/2020 | One Legal (Inv. 12184634) filing proof of service TAS001 12/19/2019 | 13.65 |
| 01/12/2020 | Oswaldo Lopez (# 0086601) services of process TAS001 12/19/2019 | 65.00 |
| | Total ordinary costs of litigation | \$566.27 |

ROBERT D SKEELS

Attorney and Counselor
at Law

132 North Westlake Avenue
Los Angeles, CA 90026

rdsathene@alumni.ucla.edu
rdsathene@sbcglobal.net

(213) 234-8561

PCL JD '18

UCLA BA '14

USN ESWVS '85

SBN 325896

June 21, 2020

Jeffrey L. Anderson, Esq.
Young, Minney & Corr, LLP
655 University Ave, Suite 150
Sacramento, CA 95825

Via electronic mail to <janderson@mycharterlaw.com>

Re: Reasonable Attorneys Fees for Case Number 19STCP05135, Adrian Riskin v. The
Accelerated Schools

Dear Mr. Anderson:

Please find attached to be the accounting of reasonable attorney fees and paralegal fees
associated with this litigation that have been recorded contemporaneously to date.

Please note that for settlement purposes only, I have not included any billing since our
January 29, 2020 discussion regarding a second extension for your client.

Summary of fees:

Attorney Fees

29.6 hours at attorney rate of \$235 per billable hour \$6956.00
4.9 hours at paralegal rate of \$65 per billable hour \$318.50

Total **\$7274.50**

Sincerely,



Robert D. Skeels, Esq.

Timekeeping Case Number 19STCP05135, Adrian Riskin v. The Accelerated Schools

| Date | Task | Tenths |
|------------|---|------------------|
| 2019-10-20 | Read emails for TAS CPRA Writ | 1.3 |
| 2019-10-25 | Read emails for TAS CPRA Writ | 2.3 |
| 2019-10-26 | Read emails for TAS CPRA Writ | 1.7 |
| 2019-10-26 | Read emails for TAS CPRA Writ | 1.3 |
| 2019-10-27 | Phone call from client with details for TAS CPRA Writ | 0.3 |
| 2019-10-27 | Legal research - generalized CPRA for similar claims | 1.7 |
| 2019-10-28 | Legal research - caselaw supporting claims | 1.9 |
| 2019-10-30 | Phone call with client with details for TAS CPRA Writ | 0.4 |
| 2019-10-30 | Research - articles supporting usefulness of Riskin's work to community | 1.9 |
| 2019-11-02 | Draft CPRA Petition/Complaint | 3.5 |
| 2019-11-02 | Draft CPRA Petition/Complaint | 2.6 |
| 2019-11-08 | Draft CPRA Petition/Complaint | 2.2 |
| 2019-11-10 | Draft CPRA Petition/Complaint | 1.3 |
| 2019-11-12 | Draft CPRA Petition/Complaint | 3.2 |
| 2019-11-13 | Draft CPRA Petition/Complaint | 0.9 |
| 2019-11-18 | Draft CPRA Petition/Complaint | 0.9 |
| 2019-11-23 | Email final draft to client | 0.1 |
| 2019-11-24 | Email from client with signed verification page | 0.1 |
| 2019-12-30 | Phone call w/OC Mr. Anderson initial | 0.2 |
| 2019-12-31 | Phone call w/ client | 0.2 |
| 2020-01-27 | Phone call w/OC Mr. Anderson re records production | 0.5 |
| 2020-01-27 | Email client regarding 20200127 TAS production offer | 0.1 |
| 2020-01-28 | Email from OC Mr. Anderson re second extension | 0.1 |
| 2020-01-28 | Email to OC Mr. Anderson re second extension | 0.1 |
| 2020-01-28 | Email from OC Mr. Anderson re second extension | 0.1 |
| 2020-01-28 | Phone call w/ client re second extension | 0.5 |
| 2020-01-29 | Email to OC Mr. Anderson re second extension | 0.2 |
| | Total | 29.6 |
| | Attorney rate @ \$235 per billable hour | \$6956.00 |
| 2019-11-24 | Attached signed verification page to final pdf | 0.1 |
| 2019-11-24 | Attached exhibits to final pdf | 2.3 |
| 2019-11-25 | Index pdf as per court rules | 0.8 |

| Date | Task | Tenths |
|------------|--|------------------|
| 2019-12-01 | Prepare forms to accompany petition/complaint | 0.6 |
| 2019-12-03 | Submit petition/complaint to court | 0.1 |
| 2019-12-07 | Print copy of petition/complaint to serve on TAS | 0.6 |
| 2019-12-16 | Meet with process server | 0.3 |
| 2019-12-18 | Submit POS | 0.1 |
| | Total | 4.9 |
| | Paralegal rate @ \$65 per billable hour | \$318.50 |
| | Aggregate Sum of All Service | \$7274.50 |

Exhibit I

From: Robert D. Skeels rdsathene@sbcglobal.net
Subject: Progress of document production in 19STCP05135 Riskin v. TAS
Date: September 19, 2020 at 14:05 PM
To: Jeffrey L. Anderson janderson@mycharterlaw.com



Dear Mr. Anderson:

We agreed to set the hearing on the petition further out in the future to provide your client ample time to finally comply with the law and begin producing records responsive to my client's CPRA requests.

I was checking to see if there's been any progress on this front. My chief concern is that my client will need time to verify if the document production is responsive to his requests.

Thank you for your time.

Sincerely,

Robert D. Skeels
Attorney and Counselor at Law
USN ESWS '85, UCLA BA '14, PCL JD '18
rdsathene@alumni.ucla.edu

STATEMENT OF CONFIDENTIALITY: This e-mail message contains information that may be confidential and privileged. Unless you are the addressee (or authorized to receive messages for the addressee), you may not use, copy, or disclose this message (or any information contained in it) to anyone. If you have received this message in error, please advise the sender by reply e-mail and delete this message.

Exhibit J

From: Robert D Skeels rdsathene@sbcglobal.net
Subject: Fwd: Progress of document production in 19STCP05135 Riskin v. TAS
Date: October 29, 2020 at 00:38 AM
To: Jeffrey L. Anderson janderson@mycharterlaw.com



Dear Mr. Anderson:

Just want to confirm that you received this communication last month.

Sincerely,

Robert D Skeels

Begin forwarded message:

From: "Robert D. Skeels" <rdsathene@sbcglobal.net>
Subject: Progress of document production in 19STCP05135 Riskin v. TAS
Date: September 19, 2020 at 14:05:06 PM PDT
To: "Jeffrey L. Anderson" <janderson@mycharterlaw.com>

Dear Mr. Anderson:

We agreed to set the hearing on the petition further out in the future to provide your client ample time to finally comply with the law and begin producing records responsive to my client's CPRA requests.

I was checking to see if there's been any progress on this front. My chief concern is that my client will need time to verify if the document production is responsive to his requests.

Thank you for your time.

Sincerely,

Robert D. Skeels
Attorney and Counselor at Law
USN ESWS '85, UCLA BA '14, PCL JD '18
rdsathene@alumni.ucla.edu

STATEMENT OF CONFIDENTIALITY: This e-mail message contains information that may be confidential and privileged. Unless you are the addressee (or authorized to receive messages for the addressee), you may not use, copy, or disclose this message (or any information contained in it) to anyone. If you have received this message in error, please advise the sender by reply e-mail and delete this message.

STATEMENT OF CONFIDENTIALITY: This e-mail message contains information that may be confidential and privileged. Unless you are the addressee (or authorized to receive messages for the addressee), you may not use, copy, or disclose this message (or any information contained in it) to anyone. If you have received this message in error, please advise the sender by reply e-mail and delete this message.

Exhibit K

From: **Josie Onishi** jonishi@mycharterlaw.com 
Subject: ADRIAN RISKIN v. THE ACCELERATED SCHOOLS (Los Angeles Superior Court Case No. 19STCP05135) - Document Production in Response to Public Records Act Request
Date: October 30, 2020 at 12:23 PM
To: Robert D Skeels rdsathene@sbcglobal.net
Cc: Jeffrey L. Anderson janderson@mycharterlaw.com, YMC - Litigation Support YMCLitigationSupport@mycharterlaw.com

JO

Good morning Mr. Skeels:

Attached are the following documents:

- (1) Correspondence of today's date in response to the Public Records Act Request received in the referenced matter;
- (2) Zip File containing Responsive Documents referenced (Bates Nos. TAS000001 through TAS55675); ,
- (3) Zip File containing Documents produced as TAS000001 through TAS55675 in its native form;
- (4) [Proposed] Settlement Agreement and Release of All Claims; and,
- (5) Proof of Service by Electronic Mail.

Please feel free to contact Mr. Anderson directly if you have any questions.
Hope all is well with you.

Citrix Attachments Expires April 28, 2021

| | |
|--|-------------|
| 20 10 29 Settlement Agreement and Release...al).pdf | 163.7 KB |
| 20 10 30 LTR Responsive Records to litigatio...AL).pdf | 468.8 KB |
| 20 10 30 POS re PRA Response (Final).pdf | 169.6 KB |
| NativeFiles.zip | 2.5 GB |
| PDF BateStamped.zip | 1.3 GB |

[Download Attachments](#)

Josie Onishi uses Citrix Files to share documents securely.

Josie Onishi

Legal Assistant | Paralegal | Sacramento Office



Young, Minney & Corr, LLP

655 University Ave, Suite 150, Sacramento, CA 95825



jonishi@mycharterlaw.com

T: 916.646.1400 | F: 916.646.1300

www.mycharterlaw.com



CONFIDENTIALITY NOTICE: This email and any files transmitted with it are confidential and intended solely for the use of the individual or entity to whom they are addressed. If you have received this email in error, please notify the sender by reply e-mail or by telephone at (916) 646-1400 and delete the transmission. Thank you.



Attachments.htm
ml



LAW OFFICES OF YOUNG, MINNEY & CORR, LLP
THE CHARTER LAW FIRM

WAYNE K. STRUMPFER ESQ.

OF COUNSEL

October 30, 2020

wstrumpfer@mycharterlaw.com

Via Electronic Mail Only

Email: rdsathene@ucla.edu

Mr. Robert D. Skeels, Esq.
Law Offices of Hirji & Chau, LLP
5173 Overland Avenue
Culver City, CA 90230-4913

**Re: Responsive Records for Public Records Act Requests from Adrian Riskin;
Riskin v. The Accelerated Schools, Superior Court of the State of California,
County of Los Angeles (Case No.: 19STCP055135)**

Dear Mr. Skeels:

Your client in the above-referenced lawsuit, Adrian Riskin, made six California Public Records Act (“CPRA”) requests between January 19, 2019 and April 6, 2019, to The Accelerated Schools. With respect to the requests, we note that under the CPRA, The Accelerated Schools is not required to create new records in order to provide Mr. Riskin with the information that he seeks. Moreover, the CPRA applies only to documents “prepared, owned, used, or retained by” The Accelerated Schools. (Govt. Code § 6252(e).) To the extent that Mr. Riskin’s requests seeks documents beyond this scope, The Accelerated Schools denies his requests. Further, The Accelerated Schools is not required to produce documents exempt from disclosure under the CPRA. (Govt. Code § 6254, 6255.) To the extent Mr. Riskin requests sought documents exempted from disclosure by the CPRA, The Accelerated Schools denies his requests.

In responding to Mr. Riskin’s requests, The Accelerated Schools does not waive any further rights it may have to withhold records pursuant to the CPRA and relevant case law, and expressly reserves those rights. Lastly, please be advised that The Accelerated Schools also reserves the right to later supplement its production of documents should additional documents responsive to his request be located. However, in a good faith effort by The Accelerated Schools to fully comply with the six CPRA requests at issue in the lawsuit, we are producing documents in two formats:

- (1) The emails that are responsive records in their original native format; and,
- (2) All responsive records Bates stamped TAS000001 through TAS55675 for reference and convenience to both parties and the Superior Court.

SACRAMENTO ■ LOS ANGELES ■ SAN DIEGO ■ WALNUT CREEK

MAIN OFFICE: 655 UNIVERSITY AVENUE, SUITE 150, SACRAMENTO, CA 95825 ■ WWW.MYCHARTERLAW.COM

TEL 916.646.1400 ■ FAX 916.646.1300

Mr. Robert D. Skeels

Re: Responsive Records for Public Records Act Requests from Adrian Riskin

October 30, 2020

Page 2 of 3

The first request from Mr. Riskin, dated January 19, 2019, requested “emails along with their attachments if any from 12/1/18 through 1/19/19 which are to or from board members or executive staff of TAS which contain any of the following search terms: 1. UTLA; 2. Strike; 3. Monat; 4. Yee; 5. Benefits; 6. Union; 7. United; 8. Bui; 9. Goldstein.”

The second request, dated January 24, 2019, requested records “from 12/1/18 through 1/24/19 which are to or from board members or executive staff of TAS which are to or from any email address at lausd.net or lacity.org.”

The third request, dated March 24, 2019, asked “to inspect, possibly to obtain copies of, records that will reveal the annual compensation, i.e. salary + benefits, of every employee of The Accelerated Schools as well as Board members if they are compensated...if any members of the administrative staff have employment contracts I would like to see copies of those as well.”

The fourth request, dated April 5, 2019, sought “to inspect/obtain copies of all emails present in the following two accounts from January 1, 2014 through April 5, 2019 that are to/from/cc/cc any email address at tribunemedia.com; williams@accelerated.org; amarshall@accelerated.org...”

The fifth request, dated April 5, 2019, sought “to inspect/obtain copies of all emails present in the accounts jwilliams@accelerated.org or marshall@accelerated.org from January 1, 2018 through April 5, 2019 that are to/from/cc/bcc: 1. Any email address at ccsa.org; 2. Any member of the board of trustees...”

The sixth request, dated April 6, 2019, asked for “all emails related to TAS business possessed by J. Williams in any account from January 1, 2018 through April 6, 2019 that are to/from/cc/bcc Kevin Sved at any email address.”

Mr. Riskin, in his six requests, asked to see all attachments to the requested emails in “their native format” and the emails in EML, MSG, or MBOX format. We have provided a file sharing site for access to all responsive documents. The access to this site is included in the email of which this letter is an attachment.

The records provided represent all the public records responsive to Mr. Riskin’s six requests in the possession of The Accelerated Schools known to the organization. Some records were not made available or were redacted based on the exemptions provided in Government Code Section 6254, subdivisions (a), (c), (k), the deliberative process privilege, and Government Code Section 6255. Government Code Section 6254(a) specifically provides exemption for records that are “preliminary drafts, notes, or interagency or intra-agency memorandum that are not retained by the public agency in the ordinary course of business, if the public interest in withholding those records clearly outweighs the public interest in disclosure.” Government Code Section 6254(c) provides exemption for records that are “personnel, medical, or similar files, the disclosure of



Mr. Robert D. Skeels

Re: Responsive Records for Public Records Act Requests from Adrian Riskin

October 30, 2020

Page 3 of 3

which would constitute an unwarranted invasion of personal privacy.” Government Code Section 6254(k) specifically provides exemption for records, “the disclosure of which is exempted or prohibited under federal and state law, including but not limited to provisions of the evidence code relating to privilege.”

Further, some records are exempt under the deliberative process privilege which provides that a local agency may withhold a public record if it can demonstrate that “on the facts of a particular case the public interest served by not making the record public clearly outweighs the public interest served by disclosure of the record.” (*Times Mirror Company v. Superior Court* (1991) 53 Cal.3d 1325, 1338.) The deliberative process privilege allows frank discussion of legal or policy matters that otherwise would be inhibited if subject to public scrutiny and to allow a broad array of opinions and points of view that are essential to effective governance in a representative democracy. (*Ibid*; See also 5 U.S.C. Section 552(b)(5).) The disclosure of these records would also constitute an unwarranted invasion of privacy and the public interest served by not disclosing the records clearly outweighs the public interest served by disclosure of the records. (Govt. Code §6255.)

Please be advised that the name and title of the person responsible for the denial is: Grace Lee-Chang, Chief Executive Officer.

Upon your review of the records being produced, we would appreciate the opportunity to meet and confer with you regarding The Accelerated School’s compliance with the six CPRA requests at issue in the lawsuit and how we can move forward toward the resolution of this lawsuit. We are hopeful that this production will be deemed acceptable and upon completion of you and your client’s review, and an agreement for the payment of your client’s reasonable attorneys’ fees, that your client will agree to dismiss this case, with prejudice.

We look forward to hearing back from you regarding these issues.

Very Truly Yours,
**LAW OFFICES OF YOUNG,
MINNEY & CORR, LLP**



Wayne K. Strumpfer
ATTORNEY AT LAW

Enclosures



SETTLEMENT AGREEMENT AND RELEASE

This Settlement Agreement and Mutual Release ("Agreement") is entered into by and between (a) Adrian Riskin, an individual ("Riskin") and (b) The Accelerated Schools, a California non-profit corporation, its Board and officers ("TAS"). Collectively, Riskin and TAS shall be referred to as the "Parties."

RECITALS

WHEREAS, beginning on January 1, 2019 through April 6, 2019, Riskin submitted six (6) separate requests to TAS for records pursuant to the California Public Records Act ("CPRA"); and;

WHEREAS, a dispute arose between Riskin and TAS regarding TAS's production of records under Riskin's aforementioned six CPRA Requests (the "Dispute"); and

WHEREAS, as a consequence of the Dispute, Riskin commenced a lawsuit against TAS in the Superior Court for Los Angeles County, California, captioned Adrian Riskin v. The Accelerated Schools, Case No.: 19STCP05135 (the "Litigation"); and

WHEREAS, the Parties now desire to compromise and settle their outstanding differences, disputes, and claims arising out of or with respect to the Dispute and the Litigation without admitting any fault;

NOW, THEREFORE, in consideration of the mutual promises contained in this Agreement, and for good and valuable consideration, the receipt and sufficiency of which each of the Parties acknowledges, Riskin and TAS hereby agree as follows:

1. Settlement Sum.

In consideration of the promises and agreements of Riskin set forth herein, TAS agrees to pay Riskin the total sum of \$7,840.77 (the "Settlement Sum"), in full and final settlement of Riskin's claims, including claims for attorney fees and costs, and all other potential claims against TAS and/or against any and all of the "Released Parties" set forth herein.

No later than thirty (30) business days following receipt by TAS of this fully executed Agreement, TAS shall remit a check payable to "Adrian Riskin" in the amount of \$7,840.77, as reimbursement for attorneys' fees and costs of suit ("Settlement Sum"). The check shall be sent via overnight delivery to the following address:

Robert D. Skeels
Attorney and Counselor at Law
132 North Westlake Avenue
Los Angeles, CA 90026

2. Taxes; Indemnification.

(a) Riskin shall be solely responsible for, and is legally bound to make payment of, any taxes determined to be due and owing (including penalties and interest related thereto) by him to any federal, state, local, or regional taxing authority as a result of the Payment of Costs.

(b) Riskin understands that TAS has not made, and he does not rely upon, any representations regarding the tax treatment of the sums paid pursuant to this Agreement.

(c) Riskin agrees to indemnify and hold TAS harmless in the event that any governmental taxing authority asserts against TAS any claim for unpaid taxes, failure to withhold taxes, penalties, or interest based upon the Payment of Costs.

3. Release of Claims

(a) Release by Riskin. Riskin hereby releases TAS it Board and officers together with its successors, predecessors, related entities, departments, subsidiaries, representatives, assigns, agents, partners, officers, directors, managers, insurers, employees, and attorneys, for any and all known charges, complaints, claims, grievances, liabilities, obligations, promises, agreements, controversies, damages, actions, causes of action, suits, rights, demands, costs, losses, debts, penalties, fees, wages, medical costs, pain and suffering, mental anguish, emotional distress, expenses (including attorneys' fees and costs actually incurred), and punitive damages, of any nature whatsoever, whether at law or in equity, or known or unknown, which Riskin has, or may have had, against TAS, whether or not apparent or yet to be discovered, or which may hereafter develop, for any acts or omissions related to or arising from the Dispute or the Litigation.

This Agreement resolves any claim for relief that has or could have been alleged by Riskin against TAS, no matter how characterized, including, without limitation, compensatory damages, damages for breach of contract, bad faith damages, reliance damages, liquidated damages, damages for humiliation and embarrassment, punitive damages, costs, and attorneys' fees related to or arising from the Dispute.

(b) **California Civil Code Section 1542.** Riskin certifies that he has read the provisions of California Civil Code Section 1542 and has consulted his own counsel regarding that section. Riskin hereby waives any and all rights under California Civil Code Section 1542, which states:

A GENERAL RELEASE DOES NOT EXTEND TO CLAIMS THAT THE CREDITOR OR RELEASING PARTY DOES NOT KNOW OR SUSPECT TO EXIST IN HIS OR HER FAVOR AT THE TIME OF EXECUTING THE RELEASE AND THAT, IF KNOWN BY HIM OR HER, WOULD HAVE MATERIALLY AFFECTED HIS OR HER SETTLEMENT WITH THE DEBTOR OR RELEASED PARTY.

Riskin agrees and acknowledges that the released claims extend to and include unknown and unsuspected claims.

In furtherance of the Parties' intent, the release in this Agreement shall remain in full and complete effect notwithstanding the discovery or existence of any additional, contrary, or different facts.

4. Representations and Warranties.

(a) **No Outstanding or Known Future Claims or Causes of Action.** Each Party represents and warrants that it has not filed with any governmental agency or court any type of action or report against the other Party other than the Litigation, and currently knows of no existing act or omission by the other Party that may constitute a claim or liability excluded from the released claims set out in Section 3, above.

(b) **No Assignment or Transfer of Claims.** Each Party represents and warrants that they are the rightful owner of and has not encumbered, assigned, or transferred, nor will they in the future attempt to encumber, assign, or transfer, any claim for relief or cause of action released herein.

(c) **Parties' Authority to Settle.** Each Party represents and warrants that they have full authority to enter into, deliver, and perform under this Agreement, and that all acts and actions have been taken to grant such authority, and that no third-party consent, which has not already been obtained, is required.

(d) **Signatories' Authority to Execute Agreement.** Each signatory to this Agreement represents and warrants that they are authorized to execute this Agreement on behalf of the Party for whom they executed this Agreement.

(e) **No Violation of By-laws, Covenants, or Restrictions.** Each Party warrants and represents that the Party's execution of this Agreement is not in violation of any By-law, Covenants, and/or other restrictions placed upon them by their respective entities.

5. Cooperation.

Each Party agrees to take all actions and to make, deliver, sign, and file any other documents and instruments necessary to carry out the terms, provisions, purpose, and intent of this Agreement.

6. No Admission of Liability.

The Parties acknowledge that this Agreement represents a compromise and final settlement of disputed claims and agree that the performance of the conditions and provisions of this Agreement, including the payment and acceptance of the Settlement Payment, is not to be construed as an admission of any liability or wrongdoing whatsoever by any Party to this Agreement.

7. Dismissal of the Litigation.

Riskin and his counsel shall take whatever actions are necessary to ensure that the Litigation is dismissed in its entirety as to TAS, including filing a request for dismissal, with prejudice and

without the assessment of costs or fees, within 5 days of receipt of the Settlement Sum. TAS will cooperate with Riskin in securing the dismissal of the Litigation as appropriate.

8. Agreement is Legally Binding.

The Parties intend this Agreement to be legally binding upon and shall inure to the benefit of each of them and their respective parents, subsidiaries, affiliates, predecessors, successors, and, assigns, executors, administrators, heirs, and estates.

9. Entire Agreement.

This Agreement, including the recitals, constitutes the entire agreement and understanding of the Parties and supersedes all prior negotiations and/or agreements, proposed or otherwise, written or oral, concerning the subject matter hereof. Each Party acknowledges that in entering into this Agreement, they have not relied on any promise, representation, or warranty not contained in this Agreement.

10. Modification.

No modification of this Agreement shall be binding unless in writing and signed by each of the Parties hereto.

11. New or Different Facts: No Effect.

Except as provided herein, this Agreement shall be, and remain, in effect despite any alleged breach of this Agreement or the discovery or existence of any new or additional fact, or any fact different from that which either Party now knows or believes to be true.

12. Interpretation, Severability, and Enforcement.

(a) **Interpretation.** The headings in this Agreement are purely for convenience and are not to be used as an aid in interpreting its terms. The Parties agree that they participated equally in drafting and negotiating the terms of this Agreement and that this Agreement shall not be construed against either Party as the author or drafter of the Agreement.

(b) **Severability.** Should any provision of this Agreement be declared or be determined by any court to be illegal, invalid, or unenforceable, the validity of the remaining parts, terms, or provisions shall not be affected thereby and the illegal, invalid, or unenforceable part, term, or provision shall be deemed not to be a part of this Agreement.

(c) **Enforcement.** Nothing in this Agreement shall be construed as, or constitute, a release of any Party's right to enforce the terms of this Agreement.

13. Choice of Law and Forum.

(a) **Choice of Law.** This Agreement and all related documents, including all exhibits attached hereto, and all matters arising out of or relating to this Agreement, whether sounding in

contract, tort, or statute are governed by, and construed in accordance with, the laws of California (including its statutes of limitation) without giving effect to the conflict of laws provisions thereof to the extent such principles or rules would require or permit the application of the laws of any jurisdiction other than those of California.

(b) **Choice of Forum.** Each Party irrevocably and unconditionally agrees that they will not commence any action, litigation, or proceeding of any kind whatsoever against any other Party in any way arising from or relating to this Agreement and all contemplated transactions, including, but not limited to, contract, equity, tort, fraud, and statutory claims, in any forum other than the state courts of California located in Los Angeles County. Each Party irrevocably and unconditionally submits to the exclusive jurisdiction of such courts. Each Party agrees that a final judgment in any such action, litigation, or proceeding is conclusive and may be enforced in other jurisdictions by suit on the judgment or in any other manner provided by law.

14. Notice.

Each Party shall deliver all notices, requests, consents, claims, demands, waivers, and other communications under this Agreement (each, a "Notice") in writing and addressed to the other Party at its address set out below (or to any other address that the receiving Party may designate from time to time in accordance with this section). Each Party shall deliver all Notices by personal delivery, nationally recognized overnight courier (with all fees prepaid), email (with confirmation of the transmission), or certified or registered mail (in each case, return receipt requested, postage prepaid). Except as otherwise provided in this Agreement, a Notice is effective only (a) upon receipt by the receiving Party; and (b) if the Party giving the Notice has complied with the requirements of this Section. The Parties shall deliver any Notice at least seven (7) days before the event addressed by the Notice unless it is impossible to do so or a longer period is required by other terms of this Agreement.

If to Riskin:

1101 W 51st Place,
Los Angeles, CA, 90037
adrian@123mail.org
Attention: Adrian Riskin

with a copy to:

Robert D. Skeels
Attorney and Counselor at Law
rdsattheone@alumni.ucla.edu

If to TAS:

Jeffrey L. Anderson
Young, Minney, & Corr, LLP
655 University Avenue, Suite 150
Sacramento, CA 95825
janderson@mycharterlaw.com

15. Reliance on Own Counsel.

In entering into this Agreement, each Party acknowledges that:

- (a) They have had the opportunity to seek and rely upon the legal advice of attorneys of their own choosing.
- (b) They fully understand and voluntarily accepts the Agreement's terms based on the consideration set forth in this Agreement and not on any other promises or representations by the other Party or any attorney or other agent or representative of the other Party.
- (c) In deciding to sign this Agreement, they did not rely and has not relied on any oral or written representation or statement by the other Party or any attorney, or other agent or representative of the other Party, including but not limited to any representation or statement about the subject matter, basis, or effect of this Agreement.

16. Counterparts and Copies.

This Agreement consists of six (6) pages. This Agreement may be executed by the Parties in counterparts, each of which shall be deemed an original, but all of which together shall constitute one and the same instrument. Facsimile signatures and signature pages sent by email shall be binding as though they are originals.

17. Effective Date.

The terms of the Agreement will be effective when a fully executed copy of this Agreement is delivered to counsel for TAS as described in the Notice section of this Agreement/as of the date set out in the introductory paragraph of this Agreement (the "Effective Date").

EACH OF THE PARTIES CERTIFIES THAT THEY HAVE READ ALL OF THIS AGREEMENT AND FULLY UNDERSTANDS AND AGREES TO EACH OF THE ABOVE TERMS, CONDITIONS, AND PROVISIONS.

IN WITNESS WHEREOF, and intending to be legally bound, each of the Parties hereto has caused this Agreement to be executed as of the date(s) set forth below.

Adrian Riskin

Dated: _____

Grace Lee-Chang, Chief Executive Officer
THE ACCELERATED SCHOOLS, a California
non-profit corporation

Dated: _____

1 YOUNG, MINNEY & CORR, LLP
2 PAUL C. MINNEY, SBN 166989
3 WAYNE K. STRUMPFER, SBN 160080
4 JEFFREY L. ANDERSON, SBN 157982
5 655 University Avenue, Suite 150
6 Sacramento, CA 95825
Telephone: (916) 646-1400
Facsimile: (916) 646-1300
E-mail: pminney@mycharterlaw.com
wstrumper@mycharterlaw.com
janderson@mycharterlaw.com

7 *Attorneys for Respondent,*
8 THE ACCELERATED SCHOOLS

Exempt from Filing Fees
Gov. Code § 6103

9

10 IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA
11 COUNTY OF LOS ANGELES – CENTRAL JUDICIAL DISTRICT

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13 ADRIAN RISKIN,) CASE NO.: 19STCP05135
14 Petitioner,)
15 v.)
16 THE ACCELERATED SCHOOLS,)
17 Respondent.)
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- (1) Correspondence dated October 30, 2020 to Robert D. Skeels, Esq., Law Offices of Hirji & Chau, LLP, 173 Overland Avenue, Culver City, CA 90230-4913, entitled Responsive Records for Public Records Act Requests from Adrian Riskin; Riskin v. The Accelerated Schools, Superior Court of the State of California, County of Los Angeles (Case No.: 19STCP055135);
- (2) Zip File containing Responsive Documents referenced (Bates Nos. TAS000001 through TAS55675;
- (3) Zip File containing produced as TAS000001 through TAS55675 in its native form; and,
- (4) [Proposed] Settlement Agreement and Release of All Claims,

on the interested parties in this action as follows:

ROBERT D. SKEELS, ESQ.
132 North Westlake Avenue
Los Angeles, CA 90026
Telephone: (213) 234-8561
E-mail: rdsathene@alumni.ucla.edu

Attorney for Petitioner,
ADRIAN RISKIN

| | |
|-------------------------------------|--|
| <input type="checkbox"/> | <p>(VIA U.S. MAIL) to be placed in the U.S. Mail at Sacramento, California with postage thereon fully prepaid.</p> <p>I am “readily familiar” with the firm’s practice of collection and processing correspondence for mailing. It is deposited with the U.S. Postal Service on that same day in the ordinary course of business. I am aware that on motion of party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing in affidavit.</p> |
| <input checked="" type="checkbox"/> | <p>(VIA ELECTRONIC MAIL) to be transmitted by electronically mailing a true and correct copy through an electronic mail system from jonishi@mycharterlaw.com to the email address(es) set forth as stated above per agreement in accordance with CRC Rule 2.251 and the Code of Civil Procedure section 1010.6. The transmission was reported as complete and without error.</p> |
| <input type="checkbox"/> | <p>(BY PERSONAL SERVICE) I caused such envelope to be delivered by hand to the offices of the addressee.</p> |
| <input type="checkbox"/> | <p>(VIA OVERNIGHT MAIL) by placing a true copy thereof enclosed in a sealed envelope, with delivery fees paid or provided for, in a designated area for outgoing overnight mail, addressed as set forth below. In the ordinary course of business mail placed in that designated area is picked up that same day for delivery the following business day.</p> |
| <input checked="" type="checkbox"/> | <p>(STATE) I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.</p> |

Executed on October 30, 2020 at Sacramento, California.

Jolanthe V. Onishi
Jolanthe V. Onishi

Exhibit L

From: Robert D Skeels rdsathene@alumni.ucla.edu 
Subject: re: ADRIAN RISKIN v. THE ACCELERATED SCHOOLS (Los Angeles Superior Court Case No. 19STCP05135) - Document Production in Response to Public Records Act Request
Date: November 16, 2020 at 09:14 AM
To: Wayne K Strumpfer wstrumpfer@mycharterlaw.com
Cc: Jeffrey L Anderson janderson@mycharterlaw.com, Robert D. Skeels rdsathene@alumni.ucla.edu



Dear Mr. Strumpfer:

Please find attached correspondence dated November 13, 2020 in regards to the initial document production and proffered settlement sent by your firm on October 30, 2020 in the matter referenced above.

Please feel free to contact me with any questions.

Sincerely,

Robert D. Skeels
Attorney and Counselor at Law
USN ESWS '85, UCLA BA '14, PCL JD '18
rdsathene@alumni.ucla.edu

STATEMENT OF CONFIDENTIALITY: This e-mail message contains information that may be confidential and privileged. Unless you are the addressee (or authorized to receive messages for the addressee), you may not use, copy, or disclose this message (or any information contained in it) to anyone. If you have received this message in error, please advise the sender by reply e-mail and delete this message.



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ROBERT D SKEELS

Attorney and Counselor
at Law

132 North Westlake Avenue
Los Angeles, CA 90026

rdsathene@alumni.ucla.edu
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PCL JD '18
UCLA BA '14
USN ESWS '85
SBN 325896

November 13, 2020

Wayne K. Strumpfer, Esq.
Young, Minney & Corr, LLP
655 University Ave, Suite 150
Sacramento, CA 95825

Sent via Electronic mail to: <wstrumpfer@mycharterlaw.com>
CC: <janderson@mycharterlaw.com>

**Re: Responsive Records for Public Records Act Requests from Adrian Riskin;
*Riskin v. The Accelerated Schools, Superior Court of the State of California,
County of Los Angeles (Case No.: 19STCP055135)***

Dear Mr. Strumpfer:

It's good that your client, The Accelerated Schools ("TAS" or "Respondent"), has made an initial attempt to comply with California law and disclose a portion of the records it is required to disclose under the California Public Records Act ("CPRA"). To the extent that your client partially complied, my client, Adrian Riskin, is carefully examining the records to see if they comport with the requests he made.

While we are willing, as you suggest, to meet and confer with you regarding this matter, there are some serious concerns with the record production that will be detailed below. We want to provide your client an opportunity to cure the various defects, address the omissions in production, and provide the required documentation for exempted records. It is very much my client's preferred course that TAS comply fully with the law, and that we settle this matter without further, costly, litigation. You may want to remind your client that "the general policy of the PRA favors disclosure." *Cook v. Craig* (1976) 55 Cal.App.3d 773, 781 [127 Cal.Rptr. 712].

Issues with Purported Exemptions

First, TAS' boilerplate language claiming various exemptions is seemingly inapposite. For example, TAS asserting that it "is not required to create new records", where none of my client's requests required TAS to generate new records, is irrelevant and any allusions to *Haynie v. Superior Court* (2001) 26 Cal.4th 1061, 1075 are entirely misplaced.

Moreover, TAS asserts "[s]ome records were not made available" claiming Govt. Code § 6254(k), and further states 'the disclosure of which is exempted or prohibited under federal and state law, including but not limited to provisions of the evidence code

relating to privilege.” As you know, and should relate to your client, Govt. Code § 6254(k) is not a blanket or independent exemption at all, rather “It merely incorporates other prohibitions established by law.” *County of Santa Clara v. Superior Court* (2009) 170 Cal.App.4th 1301, 1320, 89 Cal.Rptr.3d 374. As such, the courts have found that Govt. Code § 6255(a) requirement to specify the details for each record claimed to fall under an exemption claimed under Govt. Code § 6254(k) *San Diego County Employees Retirement Assn. v. Superior Court* (2011) 196 Cal.App.4th 1228, 1236 [127 Cal.Rptr.3d 479, 485] [“The agency shall justify withholding any record by demonstrating that the record in question is exempt under express provisions of this chapter...”].

For each and every record withheld under the claim of Govt. Code § 6254(k) exemptions, please provide the following information: (1) the date of the record; (2) the general nature of the record; (3) the identity and title of the author; (4) the identity and title of the recipient(s), including those who may have received “blind” copies; and (5) the specific reason(s) why the record is being withheld (i.e. the specific, express provision under CPRA). My client will then determine whether or not they want the records in question examined by the judge in camera to determine whether the claimed exemption applies, pursuant to Govt. Code § 6259(a).

Likewise, your client claims broad exemptions under “deliberative processes” privilege, but is seemingly unaware of *how narrowly the courts interpret this privilege*. Your client should know that any and all records that it is claiming fall under the deliberative processes privilege “must be both predecisional and deliberative” and that TAS has the burden to identify the decision or policy the record was part of, or prove the record’s role in the deliberative process. *Times Mirror Co. v. Superior Court* (1991) 53 Cal.3d 1325, 1352 [283 Cal.Rptr. 893, 910, 813 P.2d 240, 257].

For each and every record withheld under the claim of deliberative process privilege, please provide the following information: (1) the date of the record; (2) the general nature of the record; (3) the identity and title of the author; (4) the identity and title of the recipient(s), including those who may have received “blind” copies; and (5) the specific reason(s) why the record is being withheld (i.e. the decision or policy the record was part of, or state the record’s actual role in the deliberative process (ibid at 1352)). My client will then determine whether or not they want the records in question examined by the judge in camera to determine whether the claimed exemption applies, pursuant to Govt. Code § 6259(a).

Lastly, your client is seemingly denying records under a claim of Govt. Code §§ 6254(a) and 6255 quoting the statutory language “the public interest served by not disclosing the record clearly outweighs the public interest served by disclosure of the record.” Your client would be well served knowing that the courts *require an agency to meet a very high standard for this exemption* “The burden of proof is on the proponent of nondisclosure, who must demonstrate a ‘clear overbalance’ on the side of confidentiality. [Citations.] The purpose of the requesting party in seeking disclosure

cannot be considered..." *California State University v. Superior Court* (2001) 90 Cal.App. 4th 810, 831 [108 Cal.Rptr.2d 870, 884]. Given the high profile of TAS' activities during the period records were requested, and its relationships and correspondence with the California Charter School Association trade group and the Los Angeles Unified School District, the public interest in disclosure is quite high.

For each and every record withheld under the claim of Govt. Code §§ 6254(a) and 6255 exemptions, please provide the following information: (1) the date of the record; (2) the general nature of the record; (3) the identity and title of the author; (4) the identity and title of the recipient(s), including those who may have received "blind" copies; and (5) the specific reason(s) why the record is being withheld (i.e. the decision or policy the record was part of, or state the record's actual role in the deliberative process (*ibid* at 1352)). My client will then determine whether or not they want the records in question examined by the judge in camera to determine whether the claimed exemption applies, pursuant to Govt. Code § 6259(a).

In considering all the exemption claims challenged above, TAS should remember that "...all exemptions are narrowly construed. [Citations.] The agency opposing disclosure bears the burden of proving that an exemption applies. [Citation.]" *County of Santa Clara v. Superior Court* (2009) 170 Cal.App.4th 1301, 1321 [89 Cal.Rptr.3d 374, 388-389], as modified (Feb. 27, 2009).

Issues with Production of Records

Another issue with the production of records is that there are records that are seemingly missing, and that they would not fall under the ostensible exemptions discussed above. My client has personal knowledge, from collateral sources, of specific records that TAS is or should be in possession of. As a courtesy I will cite two here:

1. An email from lfigueroa@ccsa.org to jwilliams@accelerated.org (and others) on March 6, 2019 at 12:36 PM with subject: <Review Req'd> LAAC March Meeting Agenda & Materials
2. An email from chorton@ccsa.org to jwilliams@accelerated.org (and others) on September 19, 2018 at 10:09 AM with subject: <For Feedback/Approval by 7pm Today> LAAC Collective Renewal Criteria Letter

In providing these two examples we are trying to determine whether TAS withheld these two records under the exemptions cited *supra*, or whether they were omitted from the records production in error. If the former, then we need to know the specific reason(s) why the record is being withheld. "The agency opposing disclosure bears the burden of proving that an exemption applies. [Citation.]" *County of Santa Clara* *supra* 170 Cal.App.4th at 1321.

If it's the case that TAS omitted these and other records in error, then my client wants TAS to cure and disclose the remaining records. A complete disclosure and production of all responsive records is far more desirable to moving forward with litigation. By the same token, my client will be able to demonstrate to the court that a number of non-exempt, responsive records were omitted from disclosure, should this not be cured.

Issues with Proposed Settlement Agreement and Release

My client is, *inter alia*, an open records activist. They have made hundreds of public records requests over the years. Accordingly, they have filed many lawsuits under the auspices of Govt. Code § 6250, *et seq.* whenever agencies did not comply with the law and disclose responsive records they were lawfully required to disclose. In addition to the scores of lawsuits that went before the bench, there were many more that were settled prior to a hearing on the writ and complaint. As such, my client has signed scores of settlement agreements over the years and is very familiar with the standard agreements pertinent to CPRA settlements.

The Settlement Agreement and Mutual Release ("Agreement") TAS proffers has a number of issues that both my client and I find problematic and unacceptable.

1. First, in regards to *Section 1* of the Agreement. It is standard practice in these matters for the public agency to make checks payable to the petitioner's attorney of record rather than the petitioner themselves. Statutory court costs and reasonable attorney's fees awarded pursuant to Govt. Code § 6259(d) are not a damages windfall for a petitioner. The only funds from the award due to the petitioner are those they are reimbursed for, namely the ordinary costs of litigation (e.g. filing fees, service of process, etc.). As such, please correct the Agreement to reflect this and make the check out to Robert D. Skeels, Attorney for Adrian Riskin.
2. My client is unwilling to agree to anything in *Section 2* of the Agreement, and particularly *Section 2(c)*. Again, the statutory award under Govt. Code § 6259(d) is not a damages windfall or source of income for the petitioner. There is no tax liability at issue for the petitioner as a result of this litigation. Furthermore, TAS' request for indemnity is inapposite in regards to my client, who has no relation to TAS' own tax liabilities. Accordingly, my client will not agree to the Agreement until *Section 2* of the Agreement is severed and stricken in its entirety.
3. *Section 4(a)* of the Agreement does not limit the scope to the instant matter. My client will agree to the Agreement if the clause "Each Party represents and warrants that it has not filed with any governmental agency or court any type of action or report against the other Party other than the Litigation" is amended to read "Each Party represents and warrants that it has not filed with any governmental agency or court any type of action or report relating to the Dispute against the other Party other than the Litigation"

4. *Section 4(e)* of the Agreement is inapposite. My client, the petitioner, is not an “entit[y]”, nor are they associated with any entities in regards to this litigation, and hence has no by-laws, covenants, or restrictions to violate. On the other hand, my client needs no warranty from TAS on these issues, since the statute compels TAS to comply with the law. Accordingly, *Section 4(e)* of the Agreement should be severed and stricken in its entirety.

5. Lastly, *Section 17* of the Agreement only provides a place for the parties to execute the document. Neither my client nor I have ever seen a CPRA settlement agreement that didn’t provide for both the parties and their counsel to sign, or just for counsel to sign on behalf of the client. The former is preferable.

A Preference to Settle

As noted before my client’s preferred course is that TAS comply fully with the law, and that we settle this matter without further, costly, litigation. This goal can be achieved by addressing the issues discussed above. Resolving the issues with exemptions claimed, accounting for missing records (preferably disclosing all of them), and addressing the issues with the proposed settlement agreement will go a long way towards settling this matter before the hearing date. Ultimately TAS must comply with the law and disclose all the responsive records that it is legally mandated to disclose *Cook* supra 55 Cal.App.3d at 781.

This initial, partial production of records seemingly shows that TAS is finally willing to comply with California law. We want to work together in good faith to ensure that TAS fully complies. Please feel free to contact me with any questions you may have.

Sincerely

Robert D. Skeels, Esquire

Exhibit M

From: Jeffrey L. Anderson janderson@mycharterlaw.com 
Subject: FW: Riskin v. The Accelerated Schools, Superior Court of the State of California - County of Los Angeles (Case No.: 19STCP055135)
Date: January 6, 2021 at 10:17 AM
To: Robert D. Skeels rdsathene@ucla.edu
Cc: YMC - Litigation Support YMCLitigationSupport@mycharterlaw.com

JA

Resending. Here you go.

Jeffrey L. Anderson

Of Counsel | Attorney at Law | Sacramento Office



Young, Minney & Corr, LLP

655 University Ave, Suite 150, Sacramento, CA 95825

janderson@mycharterlaw.com

T: 916.646.1400 | F: 916.646.1300 | C: 916.397.8418

www.mycharterlaw.com



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From: Josie Onishi <jonishi@mycharterlaw.com>

Sent: Thursday, December 10, 2020 4:09 PM

To: rdsathene@alumni.ucla.edu

Cc: Paul C. Minney <pminney@mycharterlaw.com>; Wayne K. Strumpfer <wstrumpfer@mycharterlaw.com>; Jeffrey L. Anderson <janderson@mycharterlaw.com>; YMC - Litigation Support <YMCLitigationSupport@mycharterlaw.com>

Subject: Riskin v. The Accelerated Schools, Superior Court of the State of California - County of Los Angeles (Case No.: 19STCP055135)

Good afternoon Mr. Skeels:

Attached is our letter of today's date in response to your correspondence dated November 13, 2020 regarding the Public Records Act Request in the reference matter.

Please feel free to contact Mr. Strumpfer directly with any questions.

Best regards,

Josie Onishi

Legal Assistant | Paralegal | Sacramento Office



Young, Minney & Corr, LLP

[655 University Ave, Suite 150, Sacramento, CA 95825](http://655UniversityAve.com)

jonishi@mycharterlaw.com

T: [916.646.1400](tel:916.646.1400) | F: [916.646.1300](tel:916.646.1300)

www.mycharterlaw.com



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Skeels...AL).pdf



LAW OFFICES OF YOUNG, MINNEY & CORR, LLP
THE CHARTER LAW FIRM

December 10, 2020

WAYNE K. STRUMPFER ESQ.
OF COUNSEL
wstrumpfer@mycharterlaw.com

VIA EMAIL:
RDSATHENE@ALUMNI.UCLA.EDU

Robert D. Skeels, Attorney and Counselor at Law
132 North Westlake Avenue
Los Angeles, CA 90026

**Re: *Riskin v. The Accelerated Schools*, Superior Court of the State of California,
County of Los Angeles (Case No.: 19STCP055135)**

Dear Mr. Skeels:

As you know, our office serves as general counsel for The Accelerated Schools Board. You delivered a letter via email dated November 13, 2020, that claims The Accelerated Schools has “partially complied” with your client’s Public Records Act requests, but that “there are some serious concerns with the record production...” You list a number of complaints and demands regarding: 1) Records that were exempted under the Public Records Act; 2) the production of records; and 3) issues with the proposed settlement agreement and release. Our response follows.

Records Exempted in Compliance with the Public Records Act

The Accelerated Schools provided your client with over 55,000 pages of records based on six Public Records Act requests. Not surprisingly, there were some records that were properly exempted by The Accelerated Schools in compliance with the Public Records Act. As required, we provided your client with the legal authority for why a very small percentage of records were not provided to him. For instance, we cited Government Code Section 6254(k) for records that are attorney-client privileged or records that are confidential student information in compliance with the Family Educational Rights and Privacy Act (“FERPA”). We also noted that some records were exempted based on the deliberative process privilege described by the California Supreme Court in *Times Mirror Co. v. Superior Court* (1991) 53 Cal.3d 1325. Additionally, we explained some records were exempt based on the statutory exemption found in Government Code Sections 6254(a), and separately, 6255.

The claim based on your legal analysis that these exemptions do not apply to the records withheld in this matter is incorrect. Additionally, your request that for each exempted record, we provide “(1) the date of the record; (2) the general nature of the record; (3) the identity and title of the author; (4) the identity and title of the recipient(s), including those who may have received “blind” copies; and (5) the specific reason(s) why the record is being withheld” is not based on relevant legal authority.

SACRAMENTO ■ LOS ANGELES ■ SAN DIEGO ■ WALNUT CREEK

MAIN OFFICE: 655 UNIVERSITY AVENUE, SUITE 150, SACRAMENTO, CA 95825 ■ WWW.MYCHARTERLAW.COM

TEL 916.646.1400 ■ FAX 916.646.1300

The California Supreme Court, in *Haynie v. Superior Court* (2001) 26 Cal.4th 1061, 1073, stated that the Court has not required a public agency “to create an inventory of the records responsive to the request or those for which it claims an exemption” in the initial response for inspection of records. (See also *Williams v. Superior Court* (1993) 5 Cal.4th 337, 344.) “The Legislature, which has carefully detailed the components of the agency’s denial of a CPRA request, even to the point of requiring the agency to ‘set forth the names and titles or positions of each person responsible for the denial’ (§6253, subd. (d)), is fully capable of requiring agencies to include a log of withheld documents” but did not require the agency to do so. (*Haynie, supra*, 26 Cal.4th at p. 1074.) Thus, the Haynie Court went on to say that given this detailed statutory scheme, it would be inappropriate for the Supreme Court “to enlarge the agency’s burden under the guise of interpreting the statute.” (*Ibid.*)

The Production of Records

In your November 13, 2020, letter, you also claim that your client “has personal knowledge, from collateral sources, of specific records that TAS is or should be in possession of.” As a “courtesy,” you provided two examples: 1) An email from lfigueroa@ccsa.org to williams@accelerated.org (and others) on March 6, 2019 at 12:36 PM with subject: <Review Req'd> LAAC March Meeting Agenda & Materials, and 2) An email from chorton@ccsa.org to jwilliams@accelerated.org (and others) on September 19, 2018 at 10:09 AM with subject: <For Feedback/Approval by 7pm Today> LAAC Collective Renewal Criteria Letter.

We attempted to find the two emails that you use as examples in the records possessed by The Accelerated Schools. We were able to find the second email you cite (from chorton@ccsa.org) and are providing it as an attachment to the email that includes this letter. There is no record that could be found with due diligence in the possession of The Accelerated Schools that is of what you describe in your first example.

Issues with the Proposed Settlement Agreement and Release

We join in your client’s desire of a preference to settle this matter without further, costly litigation. With that in mind, we agree to make the changes to the Settlement Agreement you request.

Please contact me if you have any questions.

Very Truly Yours,
LAW OFFICES OF YOUNG,
MINNEY & CORR, LLP



Wayne K. Strumpfer
ATTORNEY AT LAW

ATTACHMENT



From: Cassy Horton <chorton@ccsa.org>

Sent: Wednesday, September 19, 2018 10:09 AM PDT

To: Ana Ponce <aponce@caminonuevo.org>; C DeJesus <cdejesus@greendot.org>; Emilio Pack <epack@stemprep.org>; Marcia Aaron <maaron@kippla.org>; bbauer <bbauer@ghchs.com>; erin.studer@chimeinstitute.org <erin.studer@chimeinstitute.org>; Valerie Braimah <vbraimah@citycharterschools.org>; Oliver Sicat <osicat@ednovate.org>; Pamela Magee <pmagee@palihigh.org>; P Hudnut <phudnut@icefps.org>; emorris@endeavorcollegeprep.org <emorris@endeavorcollegeprep.org>; Vanessa Jackson <vanessajackson@collegiatecharterhighschool.org>; Yvette Kingberg <Ykingberg@yahoo.com>; Mark Kleger-Heine <mkleger-heine@cwlosangeles.org>; cwagner@galschoolsla.org <cwagner@galschoolsla.org>; agoldring@laleadership.org <agoldring@laleadership.org>; nbarriga@resoluteacademy.org <nbarriga@resoluteacademy.org>; Johnathan Williams <jwilliams@accelerated.org>; NHCA <rthomas@nhcharteracademy.com>

CC: Keith Dell'Aquila <KDellAquila@ccsa.org>

Subject: <For Feedback/Approval by 7pm Today> LAAC Collective Renewal Criteria Letter

Attachment(s): "180919 Confident Draft- Renewal Criteria Collective Letter.docx"

Hi everyone,

Thanks for your time and engagement at yesterday's LAAC meeting. We are excited to move our LAAC-approved policy priorities forward this year, including updated local charter renewal criteria and a student-focused performance framework.

Response/Approval Requested by 7pm Today

Since we met yesterday, our team incorporated the feedback you provided about our collective renewal letter and made corresponding updates which we have initially vetted by our chair and co-chair. **We request that each of you review the attached updated collective letter and respond directly via email to Keith (cc'd here) and me with feedback or suggested edits by end of day today. We will work to synthesize overall feedback and nail down a final draft with Emilio and Cristina today.**

Our goal is to secure the support of the entire LAAC before we distribute this letter the broader charter community tomorrow. **We hope to collect signatures of 75% of the charter community by Monday, September 24 to send to the Board on Tuesday prior to the Board Meeting on September 25.**

We are happy to jump on the phone today with folks if that is easier than providing written feedback.

Cassy

Cassy Horton
Managing Director, Regional Advocacy, Greater Los Angeles
California Charter Schools Association
Cell: 213-926-7763
Email: chorton@ccsa.org
Website: www.ccsa.org

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Honorable Board Members and Superintendent Beutner:

The Los Angeles Advocacy Council (LAAC) and undersigned **XX** charter organizations are committed to working with the District to establish charter renewal criteria that strengthens transparency and prioritizes student learning. Our students, families, and teachers deserve no less. With L.A. Unified as our authorizer, we have worked together to establish some of the strongest charter schools in the country. This is a priority that can bring the District and charter community together to create more accountability in our local authorizing environment.

The time is right for us to address the issue of charter renewal criteria head-on. The Board of Education will consider **x** number of charter schools seeking renewal this month, and make high-stakes decisions about the continued operation of **X** number of charters serving over **X** students seeking renewal during the remainder of 2018. In December, this Board will consider staff recommendations to develop a District-wide School Performance Framework to create a “comprehensive picture of school performance based on student learning and achievement.”

As these high-stakes conversations move forward, the District, Superintendent and Board have a critical opportunity to protect the best interests of students and educators by developing transparent standards for charter school re-authorization that align with existing state law and prioritize student outcomes.

Renewal Decisions without Clear Criteria Harm Students and Educators

We recognize that this issue is underpinned by inaction to update charter renewal criteria at the State level. But, as a leading authorizer L.A. Unified has the responsibility and ability to define the standards determining which charters get renewed under existing law.

Without clear, consistent, transparent renewal criteria, students, families, educators, and our entire local public education system suffer. Students and families do not have clarity as to whether their school has performed sufficiently and deserves another five years to operate. Educators strive to meet student needs without a strong sense of whether outcomes are sufficient to justify charter renewal. District staff, leadership, and even Board Members grapple with high-stakes decisions without a common framework and perspective on what constitutes success and how to interpret the law: as a result, staff work and Board decisions lack transparency and consistency and can be interpreted as political or subjective.

These issues have meaningful consequences: quality schools have been denied locally and then approved at the County and State, outside the District’s oversight; dozens of schools are threatened by the possibility of future revocation based on haphazard and unreasonable renewal benchmarks grounded in the State Dashboard this Board has criticized; and politics cloud important decisions that should be based on fact.

L.A. Unified Should Lead on Charter Accountability Through Updated Local Renewal Criteria

L.A. Unified can and should lead on accountability and student outcomes by focusing on charter renewal criteria. The charter community support clear renewal criteria so we can hold ourselves to those standards, and the District can do the same with an eye towards increased accountability and transparency, and system-wide improvements in student learning.

We therefore respectfully ask District staff, leadership, and Board Members to:

- Assess 2018-19 charter renewals consistently, despite the absence of clear local or update state criteria, by evaluating schools based on their overall student academic outcomes, performance relative to demographically similar schools, and student academic growth or college eligibility. These are measures the charter community has explicitly included in the majority of petitions before the board this year in an effort to improve accountability and transparency.
- Prioritize student academic outcomes and growth in all 2018-19 renewal decisions and policy decisions related to charter renewal, including the development of the School Performance Framework to the extent it is intended to “inform renewal”.
- Meet with the charter community to discuss the path to create updated renewal criteria for 2019-20 school year to establish a transparent framework for charter renewal that aligns with State law and prioritizes student learning.

The time is right for us to tackle this critical issue together. Students, families, and educators District-wide will benefit from the important work of updating charter renewal criteria, which furthers the values we share around accountability, transparency, and improved student outcomes..

In partnership,

Exhibit N

From: Robert D Skeels rdsathene@alumni.ucla.edu 
Subject: Riskin v. The Accelerated Schools, Superior Court of the State of California, County of Los Angeles (Case No.: 19STCP055135)
Date: January 12, 2021 at 22:11 PM
To: Wayne K. Strumpfer wstrumpfer@mycharterlaw.com
Cc: Jeffrey L Anderson janderson@mycharterlaw.com
Bcc: Robert D. Skeels rdsathene@sbcglobal.net



Dear Mr. Strumpfer:

Please find attached a letter in response to your December 10, 2020 correspondence regarding *Riskin v. The Accelerated Schools*, Superior Court of the State of California, County of Los Angeles (Case No.: 19STCP055135).

Please feel free to contact me with any questions you may have.

Sincerely,

Robert D. Skeels
Attorney and Counselor at Law
USN ESWs '85, UCLA BA '14, PCL JD '18
rdsathene@alumni.ucla.edu

ROBERT D SKEELS
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(213) 234-8561

PCL JD '18
UCLA BA '14
USN ESWs '85
SBN 325896

January 12, 2021

Wayne K. Strumpfer, Esq.
Young, Minney & Corr, LLP
655 University Ave, Suite 150
Sacramento, CA 95825

Sent via Electronic mail to: <wstrumpfer@mycharterlaw.com>
CC: <janderson@mycharterlaw.com>

Re: *Riskin v. The Accelerated Schools, Superior Court of the State of California, County of Los Angeles (Case No.: 19STCP055135)*

Dear Mr. Strumpfer:

I am in receipt of your letter dated December 10, 2020 on behalf of your client, The Accelerated Schools ("TAS"). After close consultation with my client, we've decided to move forward with this litigation despite good faith attempts to settle this matter.

As you and Mr. Anderson know, but TAS apparently does not, the determination as to whether a responsive record actually falls under an exemption provided under the California Public Records Act ("CPRA") is made by the judge *in camera*. Not having sufficient information provided by your client as to the specifics for the records in question leaves us little choice but to ask the judge to review the records. Ultimately, "...all exemptions are narrowly construed. [Citations.] The agency opposing disclosure bears the burden of proving that an exemption applies. [Citation.]" *County of Santa Clara v. Superior Court* (2009) 170 Cal.App.4th 1301, 1321 [89 Cal.Rptr.3d 374, 388-389], as modified (Feb. 27, 2009).

Moreover, as noted in previous correspondence, my client is in possession of dozens of specific records, from collateral sources, that TAS either is or should be in possession of. Their absence from the records production is seemingly dispositive that TAS did not exercise due diligence and conduct a thorough search for responsive records. This,

combined with the unreasonable delays in production, as well as TAS not treating each separate request to a separate response, would seem to indicate that TAS has not fully complied with the law, and will likely continue to act in an unlawful manner in the future. Please feel free to contact me with any questions you may have.

Sincerely

A handwritten signature in black ink, appearing to read "Robert D. Skeels".

Robert D. Skeels

ROBERT D SKEELS

Attorney and Counselor
at Law

132 North Westlake Avenue
Los Angeles, CA 90026

rdsathene@alumni.ucla.edu
rdsathene@sbcglobal.net
(213) 234-8561

PCL JD '18
UCLA BA '14
USN ESWs '85
SBN 325896

January 12, 2021

Wayne K. Strumpfer, Esq.
Young, Minney & Corr, LLP
655 University Ave, Suite 150
Sacramento, CA 95825

Sent via Electronic mail to: <wstrumpfer@mycharterlaw.com>
CC: <janderson@mycharterlaw.com>

Re: *Riskin v. The Accelerated Schools, Superior Court of the State of California, County of Los Angeles (Case No.: 19STCP055135)*

Dear Mr. Strumpfer:

I am in receipt of your letter dated December 10, 2020 on behalf of your client, The Accelerated Schools ("TAS"). After close consultation with my client, we've decided to move forward with this litigation despite good faith attempts to settle this matter.

As you and Mr. Anderson know, but TAS apparently does not, the determination as to whether a responsive record actually falls under an exemption provided under the California Public Records Act ("CPRA") is made by the judge in camera. Not having sufficient information provided by your client as to the specifics for the records in question leaves us little choice but to ask the judge to review the records. Ultimately, "...all exemptions are narrowly construed. [Citations.] The agency opposing disclosure bears the burden of proving that an exemption applies. [Citation.]" *County of Santa Clara v. Superior Court* (2009) 170 Cal.App.4th 1301, 1321 [89 Cal.Rptr.3d 374, 388–389], as modified (Feb. 27, 2009).

Moreover, as noted in previous correspondence, my client is in possession of dozens of specific records, from collateral sources, that TAS either is or should be in possession of. Their absence from the records production is seemingly dispositive that TAS did not exercise due diligence and conduct a thorough search for responsive records. This, combined with the unreasonable delays in production, as well as TAS not treating each separate request to a separate response, would seem to indicate that TAS has not fully complied with the law, and will likely continue to act in an unlawful manner in the future. Please feel free to contact me with any questions you may have.

Sincerely



Robert D. Skeels

PROOF OF SERVICE

Adrian Riskin vs. The Accelerated Schools [19STCP05135]

STATE OF CALIFORNIA COUNTY OF LOS ANGELES

I am employed in the aforesaid county; I am over the age of eighteen years and not a party to the within entitled action; my business address is: 132 Westlake Avenue, Los Angeles, California 90026.

On January 22, 2021, I served the foregoing document(s) described as: **Notice of Hearing on Motion For Petition for Writ of Mandamus Directed at The Accelerated Schools; Memorandum of Points and Authorities in Support of Petition for Writ of Mandamus; Declarations of Robert D. Skeels & Adrian Riskin** on the interested parties in said action by placing a true and correct copy thereof enclosed in a sealed envelope addressed as set forth below to:

Jeffrey L. Anderson
Young, Minney & Corr, LLP
655 University Ave, Suite 150
Sacramento, CA 95825
janderson@mycharterlaw.com

Attorney for Respondent,
The Accelerated Schools

[] [VIA MAIL] by depositing said envelope with postage thereon fully prepaid in the United States mail at Los Angeles, California. I am "readily familiar" with the firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with the U.S. Postal Service on that same day with postage thereon fully prepaid at Los Angeles, California, in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing in affidavit.

[] **[BY PERSONAL SERVICE]** I caused the above referenced document(s) to be delivered to the addressee(s) set forth on the attached Service List.

[VIA ELECTRONIC MAIL] I caused the above-referenced document(s) to be transmitted to the named person(s) to the electronic address(es) set forth on attached Service List.

[X] [STATE] I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

Executed on January 22, 2021, at Los Angeles, California.

ROBERT D SKEELS, ESQ.